

## Howell, Adam

---

**From:** Mahle, Kendrick <kendrick.mahle@bia.gov>  
**Sent:** Monday, July 20, 2015 2:12 PM  
**To:** Howell, Adam  
**Subject:** Re: FW: Keams Canyon WWTF NPDES compliance discussion

Thank you Adam.

Ken

On Mon, Jul 20, 2015 at 2:09 PM, Howell, Adam <[Howell.Adam@epa.gov](mailto:Howell.Adam@epa.gov)> wrote:

Mr. Mahle,

Please see the email to Mr. Krause which I've forwarded below.

*Adam Howell*

Clean Water Act Section

US EPA Region IX

(415) 947-4248

[howell.adam@epa.gov](mailto:howell.adam@epa.gov)

---

**From:** Howell, Adam  
**Sent:** Monday, July 20, 2015 11:41 AM  
**To:** 'Krause, John'  
**Cc:** Sheth, Gary; [lpuhuyesva@hopi.nsn.us](mailto:lpuhuyesva@hopi.nsn.us)  
**Subject:** RE: Keams Canyon WWTF NPDES compliance discussion

John,

During our conference call a question came up about the effluent limits for ammonia. The ammonia limits in any NPDES permit issued by U.S. EPA would be based on the Hopi Water Quality Standards. I've attached a copy of the most recent standards as provided to me by Lionel Puhuyesva. See Appendix A-3 for the tables of numeric limits for ammonia. As you'll see, there are two different tables. The limits in Table A-3a are dependent pH only and are for use in water

bodies where Salmonids are absent. The limits in Table A-3b are dependent on both pH and temperature and are for use where salmonids are present. I'm not sure how that determination is made, but I'm sure the Hopi environmental staff can answer any questions you might have.

Best,

*Adam Howell*

Clean Water Act Section

US EPA Region IX

(415) 947-4248

[howell.adam@epa.gov](mailto:howell.adam@epa.gov)

**From:** Krause, John [<mailto:john.krause@bia.gov>]

**Sent:** Thursday, July 02, 2015 12:55 PM

**To:** Howell, Adam

**Cc:** Sheth, Gary; [lpuhuyesva@hopi.nsn.us](mailto:lpuhuyesva@hopi.nsn.us); Terry Holley; Kendrick Mahle; John Graves; Shepherdson, Melanie; Adrienne Gaziano; Wendell Honanie; [brad.rea@ihs.gov](mailto:brad.rea@ihs.gov)

**Subject:** Re: Keams Canyon WWTF NPDES compliance discussion

Adam:

Other key technical players associated with this call include: John Graves (compliance), Kendrick Mahle (COR), Terry Holley (BIA consultant), Brad Rea (consultant (IHS)), Wendell Honanie (line official).

In order for the consultant to complete their design work, they have requested what effluent limitations will need to be adhered to associated with the new permit. So, we need to have the consultant staff developing the design available for the call. I will be on leave on Monday and will confirm their participation on Tuesday.

Agenda:

1. Overview of Facility Actions to Date

2. Existing Permit Requirements
3. Past Excursions and Issues with Effluent Limitations
4. New Permit Effluent Limitations
5. Planned Facility Actions

On Thu, Jul 2, 2015 at 11:27 AM, Howell, Adam <[Howell.Adam@epa.gov](mailto:Howell.Adam@epa.gov)> wrote:

John – I've scheduled the meeting you requested for next Wednesday afternoon according to the availability you provided. Feel free to invite others as you see fit. Can you please provide a brief agenda prior to the meeting? Call in information is below.

Best,

-Adam Howell

Dial-in number: (866) 299-3188

Conference code: 415-258-3007

--

John F. Krause

Regional Environmental Scientist

Bureau of Indian Affairs

Division of Environmental and Cultural Resources Management

2600 N. Central Avenue

Phoenix, AZ 85004

602-379-3723

--

Kendrick Mahle, Facilities Program Specialist  
2600 N. Central Ave.  
Phoenix, AZ. 85004  
602.379.6755

## Howell, Adam

---

**From:** Howell, Adam  
**Sent:** Monday, July 20, 2015 2:10 PM  
**To:** Mahle, Kendrick  
**Subject:** FW: Keams Canyon WWTF NPDES compliance discussion  
**Attachments:** H-042-2011waterqualitystandards.pdf

Mr. Mahle,

Please see the email to Mr. Krause which I've forwarded below.

*Adam Howell*  
Clean Water Act Section  
US EPA Region IX  
(415) 947-4248  
[howell.adam@epa.gov](mailto:howell.adam@epa.gov)

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[howell.adam@epa.gov](mailto:howell.adam@epa.gov)

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John F. Krause  
Regional Environmental Scientist  
Bureau of Indian Affairs  
Division of Environmental and Cultural Resources Management  
2600 N. Central Avenue  
Phoenix, AZ 85004  
602-379-3723

**Howell, Adam**

---

**From:** Mahle, Kendrick <kendrick.mahle@bia.gov>  
**Sent:** Monday, July 20, 2015 1:59 PM  
**To:** Howell, Adam  
**Subject:** Ammonia Table for Wastewater Lagoon Systems

Mr. Howell,

On the conference call of 08JUL15, you stated that you would provide a copy of the Ammonia Table (loading limit) via email to Mr. Krause for use in the design of the upgrades in the process employed at Keams Canyon Wastewater Treatment Plant. I have not yet seen the Table in question and the consultant is awaiting it for inclusion in design of upgrades.

To that end, please provide me a copy of the Table. Thank you.

--

Kendrick Mahle, Facilities Program Specialist  
2600 N. Central Ave.  
Phoenix, AZ. 85004  
602.379.6755

## Howell, Adam

---

**From:** Lionel Puhuyesva <LPuhuyesva@hopi.nsn.us>  
**Sent:** Tuesday, February 24, 2015 10:24 AM  
**To:** Howell, Adam  
**Subject:** FW: Notice of Violation  
**Attachments:** Response to EPA Consultation Request.pdf

Adam,

Please see attached, the original will be sent to Ms. Johnson.

Lionel

---

Lionel Puhuyesva, Director  
Hopi Water Resources Program  
PO Box 123  
Kykotsmovi, AZ 86039  
(T) 928-734-3711  
(F) 928-734-3609  
Lpuhuyesva@hopi.nsn.us

\*\*\*\*\*  
**NOTICE**

This e-mail message is confidential, is intended only for the named recipient(s) above, and may contain information that is privileged, attorney work product or exempt from disclosure under applicable law. If you have received this message in error or are not a named recipient(s), you are hereby notified that any dissemination, distribution or copying of this e-mail is strictly prohibited. If you have received this message in error, please immediately notify the sender by return e-mail and delete this e-mail message from your computer. Thank you.

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**From:** Marilyn Fredericks  
**Sent:** Tuesday, February 24, 2015 11:15 AM  
**To:** Clayton Honyumtewa; Wayne Taylor Jr  
**Cc:** Denise Mahkewa; Lionel Puhuyesva; Gayle Honanie; Herman G. Honanie; Rose Polivema; Uberta Mowa  
**Subject:** Notice of Violation

For your files. Original will be mailed out.

Marilyn Fredericks, Chief of Staff  
Hopi Tribe, Office of the Chairman, P.O. Box 123, Kykotsmovi, AZ 86039  
928-734-3107 Office  
928-734-6665 Fax

---

**From:** Clayton Honyumtewa  
**Sent:** Tuesday, February 24, 2015 9:40 AM  
**To:** Wayne Taylor Jr  
**Cc:** Denise Mahkewa; Lionel Puhuyesva; Gayle Honanie; Herman G. Honanie; Marilyn Fredericks; Rose Polivema; Uberta



Mowa

**Subject:** RE: Notice of Violation

Mr. Taylor; attached is the response letter to USEPA request for consultation and has been process for Chairman's signature. Any questions, please contact my office by e-mail or at ext. 3601, thank you,

Clayton Honyumptewa, Director, DNR

---

**From:** Wayne Taylor Jr

**Sent:** Tuesday, February 24, 2015 9:17 AM

**To:** Clayton Honyumptewa

**Subject:** FW: Notice of Violation

Clayton – You need to be more on top of your direct reports. I asked for assistance yesterday but have received no response as yet. This request should be taken seriously as it is coming from the Chairman's office. Please have your department respond to the request from Marilyn in her latest email. Would like to have this by noon today. Thank you.

Wayne

---

**From:** Marilyn Fredericks

**Sent:** Tuesday, February 24, 2015 8:45 AM

**To:** Wayne Taylor Jr

**Cc:** Philline Talayumptewa

**Subject:** Notice of Violation

Wayne, I informed the Chairman about this issue. What we need now is technical assistance from Lionel and Gayle as to the next steps and talking points for the requested consultation. No reponse from DNR as of today. Marilyn

---

**From:** Howell, Adam [<mailto:Howell.Adam@epa.gov>]

**Sent:** Monday, February 23, 2015 2:09 PM

**To:** [Wendell.Honanie@bia.gov](mailto:Wendell.Honanie@bia.gov)

**Cc:** Todacheene, Melvin; Herman G. Honanie; Marilyn Fredericks; Gayle Honanie; Lionel Puhuyesva; Graves, John; [Bryan.Bowker@bia.gov](mailto:Bryan.Bowker@bia.gov)

**Subject:** RE: Notice of Violation

Good Afternoon All,

Please see the attached Notice of Violation for Keams Canyon Wastewater Lagoon. A hard copy was placed in the mail today. Feel free to contact me with any questions.

Best Regards,

*Adam Howell*

Clean Water Act Section

US EPA Region IX

(415) 947-4248

[howell.adam@epa.gov](mailto:howell.adam@epa.gov)

## Howell, Adam

---

**From:** Howell, Adam  
**Sent:** Monday, February 23, 2015 5:07 PM  
**To:** Lionel Puhuyesva  
**Subject:** RE: Notice of Violation

Excellent! Thank you.

*Adam Howell*  
Clean Water Act Section  
US EPA Region IX  
(415) 947-4248  
[howell.adam@epa.gov](mailto:howell.adam@epa.gov)

---

**From:** Lionel Puhuyesva [mailto:[LPuhuyesva@hopi.nsn.us](mailto:LPuhuyesva@hopi.nsn.us)]  
**Sent:** Monday, February 23, 2015 5:01 PM  
**To:** Howell, Adam  
**Subject:** RE: Notice of Violation

Yes, we are preparing a letter for the Chairman.

Lionel

Sent via the Samsung GALAXY S® 5, an AT&T 4G LTE smartphone

----- Original message -----

**From:** "Howell, Adam" <[Howell.Adam@epa.gov](mailto:Howell.Adam@epa.gov)>  
**Date:** 02/23/2015 17:59 (GMT-07:00)  
**To:** Lionel Puhuyesva <[LPuhuyesva@hopi.nsn.us](mailto:LPuhuyesva@hopi.nsn.us)>  
**Cc:**  
**Subject:** RE: Notice of Violation

Lionel,

Do you know if the Tribe have plans to request a consultation? I anticipate beginning negotiations with BIA very soon and it would great to get a letter from the Chairman one way or the other. You were copied on the original consultation offer letter, but I'm attaching it again for your reference.

Thank you,

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**To:** Howell, Adam; [Wendell.Honanie@bia.gov](mailto:Wendell.Honanie@bia.gov)  
**Cc:** Todacheene, Melvin; Herman G. Honanie; Marilyn Fredericks; [ghonanie@hopi.nsn.us](mailto:ghonanie@hopi.nsn.us); Graves, John; [Bryan.Bowker@bia.gov](mailto:Bryan.Bowker@bia.gov)  
**Subject:** RE: Notice of Violation

Thank you Adam and John for your attention and assistance on this matter.

Lionel

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Date: 02/23/2015 17:03 (GMT-07:00)  
To: [Wendell.Honanie@bia.gov](mailto:Wendell.Honanie@bia.gov)  
Cc: "Todacheene, Melvin" <[melvin.todacheene@bia.gov](mailto:melvin.todacheene@bia.gov)>, "Herman G. Honanie" <[HeHonanie@hopi.nsn.us](mailto:HeHonanie@hopi.nsn.us)>, Marilyn Fredericks <[MFredericks@hopi.nsn.us](mailto:MFredericks@hopi.nsn.us)>, Gayle Honanie <[GHonanie@hopi.nsn.us](mailto:GHonanie@hopi.nsn.us)>, Lionel Puhuyesva <[LPuhuyesva@hopi.nsn.us](mailto:LPuhuyesva@hopi.nsn.us)>, "Graves, John" <[john.graves@bia.gov](mailto:john.graves@bia.gov)>, [Bryan.Bowker@bia.gov](mailto:Bryan.Bowker@bia.gov)  
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**Cc:**  
**Subject:** RE: Notice of Violation

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Best Regards,

*Adam Howell*

Clean Water Act Section

US EPA Region IX

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[howell.adam@epa.gov](mailto:howell.adam@epa.gov)

## Howell, Adam

---

**From:** Howell, Adam  
**Sent:** Monday, February 23, 2015 4:58 PM  
**To:** Lionel Puhuyesva  
**Subject:** RE: Notice of Violation  
**Attachments:** Consultation Letter.pdf

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**Cc:** Todacheene,  
Melvin;hehonanie@hopi.nsn.us;mfedericks@hopi.nsn.us;GSHonanie@hopi.nsn.us;lpuh  
uyesva@hopi.nsn.us;Graves, John;Bryan.Bowker@bia.gov  
**Subject:** RE: Notice of Violation  
**Attachments:** 02232015 NOV for Keams Canyon.pdf

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*Adam Howell*  
Clean Water Act Section  
US EPA Region IX  
(415) 947-4248  
[howell.adam@epa.gov](mailto:howell.adam@epa.gov)

## Howell, Adam

---

**From:** Graves, John <john.graves@bia.gov>  
**Sent:** Friday, February 20, 2015 3:49 PM  
**To:** Sheth, Gary  
**Cc:** Smith, DavidW;Tran, Linh;Howell, Adam  
**Subject:** Re: Keams Canyon Permit Application  
**Attachments:** 2011-2015 Analytical Summary Table.xlsx

Thanks Gary, we'll discuss the Permit application for the new facility at a later time.

Please find attached the Excel spreadsheet used to construct the analytical results table I emailed to you earlier (as a pdf attachment).

Thank you again, have a great weekend.

On Fri, Feb 20, 2015 at 3:29 PM, Sheth, Gary <[Sheth.Gary@epa.gov](mailto:Sheth.Gary@epa.gov)> wrote:

Hello John,

Earlier this week we received your permit application for the Keams Canyon WWTP dated February 6, 2015. However, since the time the application was submitted you have indicated in email and telephone communication with staff in our office that in the future the treatment process, and the nature, quality and quantity of any effluent discharged at the Keams Canyon facility will be significantly different from the previously permitted facility. Therefore any application for an NPDES permit for the future facility needs to reflect these changes. The application currently submitted is based on an assumption of continuing the previous treatment process and so is not actionable. We expect a revised application that reflects the operation of the facility accurately going forward will be submitted and will develop a proposed permit based on that revised application.

In the meantime, please continue to work with our Enforcement Division to ensure that unauthorized discharge does not occur, and any discharge that occurs meets the terms of any negotiated or stipulated agreement between BIA and EPA.

If you have any questions or need further clarification on the NPDES permitting issues please feel free to get in touch with me or Linh Tran of the NPDES Permits Section.

Thanks,

Gary Sheth

NPDES Permits Section (WTR-2-3)

Water Division

USEPA Region 9

75 Hawthorne Street

San Francisco, CA 94105

Tel: 415.972.3516

Fax: 415.947.3549

--

John F. Graves

Project Manager / Adviser

B.S. Environmental Science & Therapy

*"working today for a better tomorrow"*

---

Bureau of Indian Affairs, Western Regional Office

Division of Environmental & Cultural Resources

2600 N. Central Avenue, Phoenix, AZ 85004

Suite 210. 4th Floor, MS 620-EM

☎ Office (602) 379-3723 ☎ Cell (602) 614-1326

EMS: <https://portal.doi.net/programs/ems/ia/western>

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## Howell, Adam

---

**From:** Sheth, Gary  
**Sent:** Friday, February 20, 2015 2:30 PM  
**To:** Graves, John  
**Cc:** Smith, DavidW;Tran, Linh;Howell, Adam  
**Subject:** Keams Canyon Permit Application

Hello John,

Earlier this week we received your permit application for the Keams Canyon WWTP dated February 6, 2015. However, since the time the application was submitted you have indicated in email and telephone communication with staff in our office that in the future the treatment process, and the nature, quality and quantity of any effluent discharged at the Keams Canyon facility will be significantly different from the previously permitted facility. Therefore any application for an NPDES permit for the future facility needs to reflect these changes. The application currently submitted is based on an assumption of continuing the previous treatment process and so is not actionable. We expect a revised application that reflects the operation of the facility accurately going forward will be submitted and will develop a proposed permit based on that revised application.

In the meantime, please continue to work with our Enforcement Division to ensure that unauthorized discharge does not occur, and any discharge that occurs meets the terms of any negotiated or stipulated agreement between BIA and EPA.

If you have any questions or need further clarification on the NPDES permitting issues please feel free to get in touch with me or Linh Tran of the NPDES Permits Section.

Thanks,

Gary Sheth  
NPDES Permits Section (WTR-2-3)  
Water Division  
USEPA Region 9  
75 Hawthorne Street  
San Francisco, CA 94105  
Tel: 415.972.3516  
Fax: 415.947.3549

## Howell, Adam

---

**From:** Graves, John <john.graves@bia.gov>  
**Sent:** Friday, February 20, 2015 7:20 AM  
**To:** Sheth, Gary;Howell, Adam;Tran, Linh  
**Cc:** John Krause;Gerald Knox;Anna Pardo;Bethany Sullivan;Carolyn Richards;Wendell Honanie;Melvin Todacheene;hepvaya  
**Subject:** Keams WWTP Monitoring Info - Please see attachments  
**Attachments:** 2011-2015 Analytical Summary Table.pdf;  
2014JanFebMar\_BIA\_KCWWTP\_AZ0022560.pdf

Analytical Results Summary Table (attached).

Monitoring Reports for Jan, Feb, & March, 2014 (attached).

Please contact me should you have questions.

--

John F. Graves  
Project Manager / Adviser  
B.S. Environmental Science & Therapy

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---

Bureau of Indian Affairs, Western Regional Office  
Division of Environmental & Cultural Resources  
2600 N. Central Avenue, Phoenix, AZ 85004  
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## Howell, Adam

---

**From:** Graves, John <john.graves@bia.gov>  
**Sent:** Thursday, February 19, 2015 11:51 AM  
**To:** Tran, Linh  
**Cc:** Howell, Adam; John Krause; Bethany Sullivan; Anna Pardo; Wendell Honanie; Sheth, Gary  
**Subject:** Jan 2015 Data / Re: BIA Keams Canyon NPDES Monitoring Reports (2011-2014)  
**Attachments:** 20150107\_BIA\_KCWWTP\_AZ0022560.pdf

Thank you too, Linh.

I contacted the lab today to inquire about the availability of analytical results from effluent samples collected the date of the last reported discharge, February 9th, 2015, which will include E. Coli, TRC, and priority pollutants. The present ETA for these reports are Friday, or early next week.

Also, I asked the lab for any results for any samples collected last month as I had not seen this data. ***January, 2015 monitoring results are attached.*** Please Note: The microbiological analysis for Dec. 2014, are included in the Jan. 2015 report; Also, the Jan. 2015 samples were collected on 01/07/15, (almost) exactly two (2) weeks prior to the rupture and subsequent discharge event on Thursday, 01/22/15.

I am working on assembly of the chronological summary table of analytical results, beginning Jan, 2011, ending Feb, 2015. I should have this information to you COB, today.

A sincere thanks, again Linh.

-johnG

On Thu, Feb 19, 2015 at 11:39 AM, Tran, Linh <[Tran.Linh@epa.gov](mailto:Tran.Linh@epa.gov)> wrote:

John,

Thank you for your expediency into this matter. Just to let you know I have received this email and attachments and forwarded them to Lilliana Christophe of our NPDES Data Team for coding. All future DMR submittals should be sent to the data team at:

NPDES Data Team

(ENF 4-1)

Information Management  
Section

Inf

Division	Enforcement
Protection Agency	U.S. Environmental
Street	75 Hawthorne
94105	San Francisco, CA

I have also received your BIA BOD/TSS/Ammonia/Fecal Results/Invoice 2/3/15. Thank you again.



Linh Tran

NPDES Permits Office (WTR-2-3)

US EPA Region 9

75 Hawthorne Street, San Francisco, CA 94105

Phone: (415)-972-3511

Email: [Tran.Linh@epa.gov](mailto:Tran.Linh@epa.gov)



**From:** Graves, John [mailto:[john.graves@bia.gov](mailto:john.graves@bia.gov)]

**Sent:** Tuesday, February 17, 2015 1:12 PM

**To:** Tran, Linh; Sheth, Gary

**Cc:** Howell, Adam; John Krause; Bethany Sullivan; Anna Pardo; Wendell Honanie

**Subject:** Re: BIA Keams Canyon NPDES Monitoring Reports (2011-2014)

Linh, Gary,

Please find attached the re-scanned, and signed, Discharge Monitoring Reports (DMRs) and analytical documentation for the Keams WWTP for the period beginning Jan, 2011 and ending Dec, 2012. I have removed duplicate pages, invoices, etc., and have arranged the documentation for each month and year in this order:

1. DMR (where available)
2. Fecal Coliform Results (where available)
3. Laboratory Cover Letter (where available)
4. Laboratory Results (where available)
5. Chain of Custody/Order Form (where available)

Also attached are the analytical reports submitted to you previously for the period beginning April, 2013 and ending Dec, 2014. These reports have not changed, and are attached only for convenience.

Thank you again for your time, and your patience in this regard. If I may be of further assistance, please contact me anytime.

-johnG

On Fri, Feb 13, 2015 at 4:11 PM, Graves, John <[john.graves@bia.gov](mailto:john.graves@bia.gov)> wrote:

Hi Linh,

a busy day for us both, I'm sure. I've re-scanned all the DMRs and will have those to you shortly. As for the operator's signature, I'll work with the Agency to get those on Tuesday, next week, if that is an option available to BIA at this time. As an alternative, my I electronically sign and submit the unsigned DMR's on the Hopi Agency's behalf by COB today?

I'm stuck here between a rock, well, and another rock..

Please advise, thanks Lihn.



On Fri, Feb 13, 2015 at 3:12 PM, Tran, Linh <[Tran.Linh@epa.gov](mailto:Tran.Linh@epa.gov)> wrote:

John,

It looks like both Adam and Gary are away from their desks. I'll have to point you to the language in our standard conditions --"Signatories to permit applications and reports" at 40 CFR 122.22.

---

2. Signatories to permit applications and reports; at 40 CFR 122.22.

a. Applications. All permit applications shall be signed as follows:

(1) For a corporation. By a responsible corporate officer. For the purpose of this section, a responsible corporate officer means: (i) A president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy- or decision-making functions for the corporation, or (ii) the manager of one or more manufacturing, production, or operating facilities, provided, the manager is authorized to make management decisions which govern the operation of the regulated facility including having the explicit or implicit duty of making major capital investment recommendations, and initiating and directing other comprehensive measures to assure long term environmental compliance with environmental laws and regulations; the manager can ensure that the necessary systems are established or actions taken to gather complete and accurate information for permit application requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.

Note: EPA does not require specific assignments or delegations of authority to responsible corporate officers identified in 40 CFR 122.22(a)(1)(i). The Agency will presume that these responsible corporate officers have the requisite authority to sign permit applications unless the corporation has notified the Director to the contrary. Corporate procedures governing authority to sign permit applications may provide for assignment or delegation to applicable corporate positions under 40 CFR 122.22(a)(1)(ii) rather than to specific individuals.

(2) For a partnership or sole proprietorship. By a general partner or the proprietor, respectively; or

(3) For a municipality, State, Federal, or other public agency. By either a principal executive officer or ranking elected official. For purposes of this section, a principal executive officer of a Federal agency includes: (i) The chief executive officer of the agency, or (ii) a senior executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., Regional Administrators of EPA).

b. All reports required by permits, and other information requested by the Director shall be signed by a person described in paragraph (a) of this section, or by a duly authorized representative of that person. A person is a duly authorized representative only if:

(1) The authorization is made in writing by a person described in paragraph (a) of this section;

(2) The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity such as the position of plant manager, operator of a well or well field, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters of the company, (A duly authorized representative may thus be either a named individual or any individual occupying a named position.) and,

(3) The written authorization is submitted to the Director.

c. Changes to authorization. If an authorization under paragraph (b) of this section is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, a new authorization satisfying the requirements of paragraph (b) of this section must be submitted to the Director prior to or together with any reports, information, or applications to be signed by an authorized representative.

d. Certification. Any person signing a document under paragraph (a) or (b) of this section shall make the following certification:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."



United States Environmental Protection Agency

Linh Tran

NPDES Permits Office (WTR-2-3)

US EPA Region 9

75 Hawthorne Street, San Francisco, CA 94105

Phone: (415)-972-3511

Email: [Tran.Linh@epa.gov](mailto:Tran.Linh@epa.gov)



Please consider the environment before printing this e-mail

**From:** Graves, John [mailto:[john.graves@bia.gov](mailto:john.graves@bia.gov)]

**Sent:** Friday, February 13, 2015 1:22 PM

**To:** Tran, Linh

**Cc:** Howell, Adam; Sheth, Gary

**Subject:** Re: BIA Keams Canyon NPDES Monitoring Reports (2011-2014)

Sorry about the post-it on page #47. That can be fixed. I think most of the indecipherable DMR reports are duplicates, and I can work on those.

May I offer the operator opportunity to sign the unsigned forms and return those to me asap?

On Fri, Feb 13, 2015 at 2:09 PM, Tran, Linh <[Tran.Linh@epa.gov](mailto:Tran.Linh@epa.gov)> wrote:

John,

I received your email and all the attachments. But I'm not sure we could accept them. All the DMRs must be signed by the principal executive officer. It looks like pages 1 to 21 were unsigned. Additionally, I find the dates in the monitoring period on most DMRs are hard to read and some (eg. Pages 31, 32, 33... onward) completely undecipherable. And page 47 has a post-it note covering the results. I'm not sure I found any 2012 DMRs in the first attachments.



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Phone: (415)-972-3511

Email: [Tran.Linh@epa.gov](mailto:Tran.Linh@epa.gov)



Please consider the environment before printing this e-mail

**From:** Graves, John [mailto:[john.graves@bia.gov](mailto:john.graves@bia.gov)]  
**Sent:** Friday, February 13, 2015 12:37 PM  
**To:** Sheth, Gary; Tran, Linh  
**Cc:** Howell, Adam  
**Subject:** BIA Keams Canyon NPDES Monitoring Reports (2011-2014)

G

ary, Linh,

Please accept and acknowledge receipt of the attached documents, which comprise available compliance monitoring information (Chain of Custody Forms, Discharge Monitoring Reports, Analytical Reports, and QA/QC Reports) for the BIA Keams Canyon Wastewater Treatment Lagoon Facility (NPDES Permit #AZ0022560), located in Keams Canyon, Arizona on the Hopi Indian Reservation.

Two portable document format (pdf) files are attached:

- 1) 2011-2012 Compliance Monitoring Reports, and;
- 2) 2013-2014 Compliance Monitoring Reports (submitted previously)

At this time, I'll begin compiling the analytical data, then update the 4-year summary table of influent / effluent monitoring results. This information shall be provided as soon as possible.

Please contact me if you have any questions or require any additional information at this time. Thank you for your patience in this regard.

Respectfully,

-john

--

John F. Graves

Project Manager / Adviser

B.S. Environmental Science & Therapy

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---

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## Howell, Adam

---

**From:** Tran, Linh  
**Sent:** Thursday, February 19, 2015 10:40 AM  
**To:** Graves, John  
**Cc:** Howell, Adam; John Krause; Bethany Sullivan; Anna Pardo; Wendell Honanie; Sheth, Gary  
**Subject:** RE: BIA Keams Canyon NPDES Monitoring Reports (2011-2014)

John,  
Thank you for your expediency into this matter. Just to let you know I have received this email and attachments and forwarded them to Lilliana Christophe of our NPDES Data Team for coding. All future DMR submittals should be sent to the data team at:

NPDES Data Team (ENF 4-1)  
Information Management Section  
Enforcement Division  
U.S. Environmental Protection Agency  
75 Hawthorne Street  
San Francisco, CA 94105

I have also received your BIA BOD/TSS/Ammonia/Fecal Results/Invoice 2/3/15. Thank you again.



United States Environmental Protection Agency

Linh Tran  
NPDES Permits Office (WTR-2-3)  
US EPA Region 9  
75 Hawthorne Street, San Francisco, CA 94105  
Phone: (415)-972-3511  
Email: [Tran.Linh@epa.gov](mailto:Tran.Linh@epa.gov)



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**From:** Graves, John [mailto:[john.graves@bia.gov](mailto:john.graves@bia.gov)]  
**Sent:** Tuesday, February 17, 2015 1:12 PM  
**To:** Tran, Linh; Sheth, Gary  
**Cc:** Howell, Adam; John Krause; Bethany Sullivan; Anna Pardo; Wendell Honanie  
**Subject:** Re: BIA Keams Canyon NPDES Monitoring Reports (2011-2014)

Linh, Gary,

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3. Laboratory Cover Letter (where available)
4. Laboratory Results (where available)
5. Chain of Custody/Order Form (where available)

Also attached are the analytical reports submitted to you previously for the period beginning April, 2013 and ending Dec, 2014. These reports have not changed, and are attached only for convenience.

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-johnG

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Hi Linh,

a busy day for us both, I'm sure. I've re-scanned all the DMRs and will have those to you shortly. As for the operator's signature, I'll work with the Agency to get those on Tuesday, next week, if that is an option available to BIA at this time. As an alternative, my I electronically sign and submit the unsigned DMR's on the Hopi Agency's behalf by COB today?

I'm stuck here between a rock, well, and another rock..

Please advise, thanks Lihn.

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John,

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---

2. Signatories to permit applications and reports; at 40 CFR 122.22.

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necessary systems are established or actions taken to gather complete and accurate information for permit application requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.

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d. Certification. Any person signing a document under paragraph (a) or (b) of this section shall make the following certification:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."



Linh Tran

NPDES Permits Office (WTR-2-3)

US EPA Region 9

75 Hawthorne Street, San Francisco, CA 94105

Phone: (415)-972-3511

Email: [Tran.Linh@epa.gov](mailto:Tran.Linh@epa.gov)



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**From:** Graves, John [mailto:[john.graves@bia.gov](mailto:john.graves@bia.gov)]

**Sent:** Friday, February 13, 2015 1:22 PM

**To:** Tran, Linh

**Cc:** Howell, Adam; Sheth, Gary

**Subject:** Re: BIA Keams Canyon NPDES Monitoring Reports (2011-2014)

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May I offer the operator opportunity to sign the unsigned forms and return those to me asap?

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Linh Tran

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Phone: (415)-972-3511

Email: [Tran.Linh@epa.gov](mailto:Tran.Linh@epa.gov)



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**From:** Graves, John [mailto:[john.graves@bia.gov](mailto:john.graves@bia.gov)]

**Sent:** Friday, February 13, 2015 12:37 PM

**To:** Sheth, Gary; Tran, Linh

**Cc:** Howell, Adam

**Subject:** BIA Keams Canyon NPDES Monitoring Reports (2011-2014)

G

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Respectfully,

-john

--

John F. Graves

Project Manager / Adviser

B.S. Environmental Science & Therapy

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John F. Graves

Project Manager / Adviser

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John F. Graves

Project Manager / Adviser

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## Howell, Adam

---

**From:** Graves, John <[john.graves@bia.gov](mailto:john.graves@bia.gov)>  
**Sent:** Wednesday, February 18, 2015 5:02 PM  
**To:** Sheth, Gary; Tran, Linh  
**Cc:** Howell, Adam; John Krause; Wendell Honanie  
**Subject:** BIA Keams Canyon WWTP Results 2/3/15  
**Attachments:** 70139-02182015143303.pdf

Gary, Linh,

Fresh WWTP results recieved today from the lab, no pun intended...

Haven't recieved the latest results yet for samples collected during the last date of discharge, which include the priority pollutant scan. However the lab emailed me this afternoon to let me know that the Arsenic concentration within the effluent were > 0.030 mg/L.

----- Forwarded message -----

From: Todacheene, Melvin <[melvin.todacheene@bia.gov](mailto:melvin.todacheene@bia.gov)>  
Date: Wednesday, February 18, 2015  
Subject: Fwd: BIA BOD/TSS/Ammonia/Fecal Results/Invoice 2/3/15  
To: John Graves <[john.graves@bia.gov](mailto:john.graves@bia.gov)>

FOR YOUR INFORMATION

----- Forwarded message -----

From: Lori Shade <[lori@mohavelabs.com](mailto:lori@mohavelabs.com)>  
Date: Wed, Feb 18, 2015 at 2:49 PM  
Subject: BIA BOD/TSS/Ammonia/Fecal Results/Invoice 2/3/15  
To: Melvin <[Melvin.Todacheene@bia.gov](mailto:Melvin.Todacheene@bia.gov)>, Rebecca <[Rebecca.Talahaftewa@bia.gov](mailto:Rebecca.Talahaftewa@bia.gov)>  
Cc: Sheila Poff <[sheila@mohavelabs.com](mailto:sheila@mohavelabs.com)>

Results/Invoice are attachedJ

Have a Blessed Day!

Lori Shade

Mohave Environmental Lab

2580 Landon Dr.

“Life isn’t about waiting for the storm to pass, its about learning to dance in the rain.”

--

John F. Graves  
Project Manager / Adviser  
B.S. Environmental Science & Therapy

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Division of Environmental & Cultural Resources  
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☎ Office (602) 379-3723 ☎ Cell (602) 614-1326

EMS: <https://portal.doi.net/programs/ems/ia/western>

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## Howell, Adam

---

**From:** Graves, John <[john.graves@bia.gov](mailto:john.graves@bia.gov)>  
**Sent:** Tuesday, February 17, 2015 1:12 PM  
**To:** Tran, Linh; Sheth, Gary  
**Cc:** Howell, Adam; John Krause; Bethany Sullivan; Anna Pardo; Wendell Honanie  
**Subject:** Re: BIA Keams Canyon NPDES Monitoring Reports (2011-2014)  
**Attachments:** 2011-2012 Analytical Reports & DMRs\_KCWWTP.pdf; 2013-2014 Analytical Reports\_KCWWTP.pdf

Linh, Gary,

Please find attached the re-scanned, and signed, Discharge Monitoring Reports (DMRs) and analytical documentation for the Keams WWTP for the period beginning Jan, 2011 and ending Dec, 2012. I have removed duplicate pages, invoices, etc., and have arranged the documentation for each month and year in this order:

1. DMR (where available)
2. Fecal Coliform Results (where available)
3. Laboratory Cover Letter (where available)
4. Laboratory Results (where available)
5. Chain of Custody/Order Form (where available)

Also attached are the analytical reports submitted to you previously for the period beginning April, 2013 and ending Dec, 2014. These reports have not changed, and are attached only for convenience.

Thank you again for your time, and your patience in this regard. If I may be of further assistance, please contact me anytime.

-johnG

On Fri, Feb 13, 2015 at 4:11 PM, Graves, John <[john.graves@bia.gov](mailto:john.graves@bia.gov)> wrote:

Hi Linh,

a busy day for us both, I'm sure. I've re-scanned all the DMRs and will have those to you shortly. As for the operator's signature, I'll work with the Agency to get those on Tuesday, next week, if that is an option available to BIA at this time. As an alternative, my I electronically sign and submit the unsigned DMR's on the Hopi Agency's behalf by COB today?

I'm stuck here between a rock, well, and another rock..

Please advise, thanks Lihn.

On Fri, Feb 13, 2015 at 3:12 PM, Tran, Linh <[Tran.Linh@epa.gov](mailto:Tran.Linh@epa.gov)> wrote:

John,

It looks like both Adam and Gary are away from their desks. I'll have to point you to the language in our standard conditions -- "Signatories to permit applications and reports" at 40 CFR 122.22.

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2. Signatories to permit applications and reports; at 40 CFR 122.22.

a. Applications. All permit applications shall be signed as follows:

(1) For a corporation. By a responsible corporate officer. For the purpose of this section, a responsible corporate officer means: (i) A president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy- or decision-making functions for the corporation, or (ii) the manager of one or more manufacturing, production, or operating facilities, provided, the manager is authorized to make management decisions which govern the operation of the regulated facility including having the explicit or implicit duty of making major capital investment recommendations, and initiating and directing other comprehensive measures to assure long term environmental compliance with environmental laws and regulations; the manager can ensure that the necessary systems are established or actions taken to gather complete and accurate information for permit application requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.

Note: EPA does not require specific assignments or delegations of authority to responsible corporate officers identified in 40 CFR 122.22(a)(1)(i). The Agency will presume that these responsible corporate officers have the requisite authority to sign permit applications unless the corporation has notified the Director to the contrary. Corporate procedures governing authority to sign permit applications may provide for assignment or delegation to applicable corporate positions under 40 CFR 122.22(a)(1)(ii) rather than to specific individuals.

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(2) The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity such as the position of plant manager, operator of a well or well field, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters of the company, (A duly authorized representative may thus be either a named individual or any individual occupying a named position.) and,

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c. Changes to authorization. If an authorization under paragraph (b) of this section is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, a new authorization satisfying the requirements of paragraph (b) of this section must be submitted to the Director prior to or together with any reports, information, or applications to be signed by an authorized representative.

d. Certification. Any person signing a document under paragraph (a) or (b) of this section shall make the following certification:

“I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.”



United States Environmental Protection Agency

Linh Tran

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US EPA Region 9

75 Hawthorne Street, San Francisco, CA 94105

Phone: (415)-972-3511

Email: [Tran.Linh@epa.gov](mailto:Tran.Linh@epa.gov)



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**Cc:** Howell, Adam; Sheth, Gary

**Subject:** Re: BIA Keams Canyon NPDES Monitoring Reports (2011-2014)

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**Cc:** Howell, Adam  
**Subject:** BIA Keams Canyon NPDES Monitoring Reports (2011-2014)

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Two portable document format (pdf) files are attached:

- 1) 2011-2012 Compliance Monitoring Reports, and;
- 2) 2013-2014 Compliance Monitoring Reports (submitted previously)

At this time, I'll begin compiling the analytical data, then update the 4-year summary table of influent / effluent monitoring results. This information shall be provided as soon as possible.

Please contact me if you have any questions or require any additional information at this time. Thank you for your patience in this regard.

Respectfully,

-john

--

John F. Graves

Project Manager / Adviser

B.S. Environmental Science & Therapy

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## Howell, Adam

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**From:** Graves, John <john.graves@bia.gov>  
**Sent:** Friday, February 13, 2015 4:20 PM  
**To:** Tran, Linh;Sheth, Gary  
**Cc:** Howell, Adam;John Krause  
**Subject:** 2011-2012 Analytical & DMRs (re-scanned)  
**Attachments:** 2011-2012 Analytical Reports & DMRs\_KCWWTP(1).pdf

Please see attached. I'll work to get Jun-Dec 2011 DMRs to you by COB Tuesday 02/17/15.

Thanks. Have a great holiday weekend, if possible.

----- Forwarded message -----

From: John Graves <[jfgraves2@cox.net](mailto:jfgraves2@cox.net)>  
Date: Friday, February 13, 2015  
Subject: 2011-2012 Ana& DMRs (re-scanned)  
To: "Graves, John" <[john.graves@bia.gov](mailto:john.graves@bia.gov)>  
Cc: [john.krause@bia.gov](mailto:john.krause@bia.gov)

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## Howell, Adam

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**From:** Sheth, Gary  
**Sent:** Friday, February 13, 2015 3:43 PM  
**To:** Graves, John; Tran, Linh  
**Cc:** Howell, Adam  
**Subject:** RE: BIA Keams Canyon NPDES Monitoring Reports (2011-2014)

John,

I've been busy but did see this email exchange. A "principal executive officer" or a designated agent needs to sign the DMRs. If you believe that you are such or can be classified as such you could sign it, otherwise the person who signed the DMRs in the past, or someone delegated that authority needs to sign it.

Also, If you want to send it just fyi, you could do it so that we at least have the data. But the signed hard copy needs to be submitted eventually.

Thanks,

Gary

**From:** Graves, John [mailto:john.graves@bia.gov]  
**Sent:** Friday, February 13, 2015 3:11 PM  
**To:** Tran, Linh  
**Cc:** Howell, Adam; Sheth, Gary  
**Subject:** Re: BIA Keams Canyon NPDES Monitoring Reports (2011-2014)

Hi Linh,

a busy day for us both, I'm sure. I've re-scanned all the DMRs and will have those to you shortly. As for the operator's signature, I'll work with the Agency to get those on Tuesday, next week, if that is an option available to BIA at this time. As an alternative, my I electronically sign and submit the unsigned DMR's on the Hopi Agency's behalf by COB today?

I'm stuck here between a rock, well, and another rock..

Please advise, thanks Lihn.

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John,

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**Cc:** Howell, Adam; Sheth, Gary

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John F. Graves

Project Manager / Adviser

B.S. Environmental Science & Therapy

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## Howell, Adam

---

**From:** Tran, Linh  
**Sent:** Friday, February 13, 2015 2:12 PM  
**To:** Graves, John  
**Cc:** Howell, Adam;Sheth, Gary  
**Subject:** RE: BIA Keams Canyon NPDES Monitoring Reports (2011-2014)

John,

It looks like both Adam and Gary are away from their desks. I'll have to point you to the language in our standard conditions --"Signatories to permit applications and reports" at 40 CFR 122.22.

---

2. Signatories to permit applications and reports; at 40 CFR 122.22.
  - a. Applications. All permit applications shall be signed as follows:
    - (1) For a corporation. By a responsible corporate officer. For the purpose of this section, a responsible corporate officer means: (i) A president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy- or decision-making functions for the corporation, or (ii) the manager of one or more manufacturing, production, or operating facilities, provided, the manager is authorized to make management decisions which govern the operation of the regulated facility including having the explicit or implicit duty of making major capital investment recommendations, and initiating and directing other comprehensive measures to assure long term environmental compliance with environmental laws and regulations; the manager can ensure that the necessary systems are established or actions taken to gather complete and accurate information for permit application requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.

Note: EPA does not require specific assignments or delegations of authority to responsible corporate officers identified in 40 CFR 122.22(a)(1)(i). The Agency will presume that these responsible corporate officers have the requisite authority to sign permit applications unless the corporation has notified the Director to the contrary. Corporate procedures governing authority to sign permit applications may provide for assignment or delegation to applicable corporate positions under 40 CFR 122.22(a)(1)(ii) rather than to specific individuals.
    - (2) For a partnership or sole proprietorship. By a general partner or the proprietor, respectively; or
    - (3) For a municipality, State, Federal, or other public agency. By either a principal executive officer or ranking elected official. For purposes of this section, a principal executive officer of a Federal agency includes: (i) The chief executive officer of the agency, or (ii) a senior executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., Regional Administrators of EPA).
  - b. All reports required by permits, and other information requested by the Director shall be signed by a person described in paragraph (a) of this section, or by a duly authorized representative of that person. A person is a duly authorized representative only if:
    - (1) The authorization is made in writing by a person described in paragraph (a) of this section;

(2) The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity such as the position of plant manager, operator of a well or well field, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters of the company, (A duly authorized representative may thus be either a named individual or any individual occupying a named position.) and,

(3) The written authorization is submitted to the Director.

- c. Changes to authorization. If an authorization under paragraph (b) of this section is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, a new authorization satisfying the requirements of paragraph (b) of this section must be submitted to the Director prior to or together with any reports, information, or applications to be signed by an authorized representative.
- d. Certification. Any person signing a document under paragraph (a) or (b) of this section shall make the following certification:

“I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.”



United States Environmental Protection Agency

Linh Tran  
NPDES Permits Office (WTR-2-3)  
US EPA Region 9  
75 Hawthorne Street, San Francisco, CA 94105  
Phone: (415)-972-3511  
Email: [Tran.Linh@epa.gov](mailto:Tran.Linh@epa.gov)



Please consider the environment before printing this e-mail

**From:** Graves, John [mailto:[john.graves@bia.gov](mailto:john.graves@bia.gov)]  
**Sent:** Friday, February 13, 2015 1:22 PM  
**To:** Tran, Linh  
**Cc:** Howell, Adam; Sheth, Gary  
**Subject:** Re: BIA Keams Canyon NPDES Monitoring Reports (2011-2014)

Sorry about the post-it on page #47. That can be fixed. I think most of the indecipherable DMR reports are duplicates, and I can work on those.

May I offer the operator opportunity to sign the unsigned forms and return those to me asap?

On Fri, Feb 13, 2015 at 2:09 PM, Tran, Linh <[Tran.Linh@epa.gov](mailto:Tran.Linh@epa.gov)> wrote:

John,

I received your email and all the attachments. But I'm not sure we could accept them. All the DMRs must be signed by the principal executive officer. It looks like pages 1 to 21 were unsigned. Additionally, I find the dates in the monitoring period on most DMRs are hard to read and some (eg. Pages 31, 32, 33... onward) completely undecipherable. And page 47 has a post-it note covering the results. I'm not sure I found any 2012 DMRs in the first attachments.



United States Environmental Protection Agency

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US EPA Region 9

75 Hawthorne Street, San Francisco, CA 94105

Phone: (415)-972-3511

Email: [Tran.Linh@epa.gov](mailto:Tran.Linh@epa.gov)



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**From:** Graves, John [mailto:[john.graves@bia.gov](mailto:john.graves@bia.gov)]

**Sent:** Friday, February 13, 2015 12:37 PM

**To:** Sheth, Gary; Tran, Linh

**Cc:** Howell, Adam

**Subject:** BIA Keams Canyon NPDES Monitoring Reports (2011-2014)

G

ary, Linh,

Please accept and acknowledge receipt of the attached documents, which comprise available compliance monitoring information (Chain of Custody Forms, Discharge Monitoring Reports, Analytical Reports, and QA/QC Reports) for the BIA Keams Canyon Wastewater Treatment Lagoon Facility (NPDES Permit #AZ0022560), located in Keams Canyon, Arizona on the Hopi Indian Reservation.

Two portable document format (pdf) files are attached:

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At this time, I'll begin compiling the analytical data, then update the 4-year summary table of influent / effluent monitoring results. This information shall be provided as soon as possible.

Please contact me if you have any questions or require any additional information at this time. Thank you for your patience in this regard.

Respectfully,

-john

--

John F. Graves

Project Manager / Adviser

B.S. Environmental Science & Therapy

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## Howell, Adam

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**Subject:** Re: BIA Keams Canyon NPDES Monitoring Reports (2011-2014)

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Phone: (415)-972-3511

Email: [Tran.Linh@epa.gov](mailto:Tran.Linh@epa.gov)



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**Cc:** Howell, Adam  
**Subject:** BIA Keams Canyon NPDES Monitoring Reports (2011-2014)

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Respectfully,



| -john

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John F. Graves

Project Manager / Adviser

B.S. Environmental Science & Therapy

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**Sent:** Friday, February 13, 2015 12:37 PM  
**To:** Sheth, Gary; Tran, Linh  
**Cc:** Howell, Adam  
**Subject:** BIA Keams Canyon NPDES Monitoring Reports (2011-2014)  
**Attachments:** 2011-2012 Analytical Reports & DMRs\_KCWWTP.pdf; 2013-2014 Analytical Reports\_KCWWTP.pdf

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## Howell, Adam

---

**From:** Tinger, John  
**Sent:** Wednesday, February 11, 2015 10:57 AM  
**To:** Howell, Adam  
**Subject:** FW: Hopi Tribe Results  
**Attachments:** HopiTribe\_020415.pdf

Hopi Water Resources took samples during the event for Total Coliform and e. coli.

John Tinger  
US EPA | Wastewater Enforcement  
75 Hawthorne St (ENF 3-1) | San Francisco CA 94105 | (415) 972-3518  
Tinger.John@EPA.gov

---

**From:** Lionel Puhuyesva [mailto:LPuhuyesva@hopi.nsn.us]  
**Sent:** Tuesday, February 10, 2015 7:17 AM  
**To:** Tinger, John  
**Subject:** FW: Hopi Tribe Results

John,

Here are the latest test results that my program took at the Keams Canyon Lagoons.

Lionel

---

Lionel Puhuyesva, Director  
Hopi Water Resources Program  
PO Box 123  
Kykotsmovi, AZ 86039  
(T) 928-734-3711  
(F) 928-734-3609  
[LPuhuyesva@hopi.nsn.us](mailto:LPuhuyesva@hopi.nsn.us)

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---

**From:** Avery Pavinyama  
**Sent:** Tuesday, February 10, 2015 8:01 AM  
**To:** Clayton Honyumtewa; Gayle Honanie; Lionel Puhuyesva; Philbert Poseyesva  
**Subject:** FW: Hopi Tribe Results

---

**From:** Uberta Mowa  
**Sent:** Monday, February 09, 2015 5:14 PM  
**To:** Avery Pavinyama; Albert Silas III  
**Subject:** FW: Hopi Tribe Results

Samples from last week

*Uberta Mowa, Grant Administrator  
Water Resources Program  
P.O. Box 123  
Kykotsmovi, AZ. 86039  
928-734-3713 (ph)  
928-734-3609 (fax)*

**From:** Spencer Ropte [<mailto:s.ropte@wt-us.com>]  
**Sent:** Monday, February 09, 2015 4:47 PM  
**To:** Uberta Mowa  
**Subject:** Hopi Tribe Results

--

**Spencer Ropte**  
Laboratory Technician  
**Nortest Analytical** a Division of Western Technologies Inc.  
2400 East Huntington Drive • Flagstaff AZ 86004  
(928) 774-2312

## Howell, Adam

---

**From:** Graves, John <john.graves@bia.gov>  
**Sent:** Monday, February 09, 2015 1:57 PM  
**To:** Howell, Adam; Sheth, Gary  
**Subject:** Fwd: Fecal result for 02/03/15  
**Attachments:** CCE02062015\_0001.pdf

preliminary results attached.

----- Forwarded message -----

From: **Sheila Poff** <[sheila@mohavelabs.com](mailto:sheila@mohavelabs.com)>  
Date: Fri, Feb 6, 2015 at 1:16 PM  
Subject: Fecal result for 02/03/15  
To: "Talahaftewa, Rebecca" <[rebecca.talahaftewa@bia.gov](mailto:rebecca.talahaftewa@bia.gov)>, Melvin Todacheene <[Melvin.Todacheene@bia.gov](mailto:Melvin.Todacheene@bia.gov)>, [john.graves@bia.gov](mailto:john.graves@bia.gov)

Fecal results attached for 02/03/15.

Thank you and have a blessed weekend!

Sheila Poff

928-754-8101

--


John F. Graves  
Project Manager / Adviser  
Environmental Science & Therapy, B.S.

---

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## Howell, Adam

---

**From:** Lionel Puhuyesva <LPuhuyesva@hopi.nsn.us>  
**Sent:** Friday, February 06, 2015 2:44 PM  
**To:** Howell, Adam  
**Subject:** RE: Upcoming EPA inspection & suggested sampling frequency

Ok, have a great weekend.

Lionel

---

**From:** Howell, Adam [mailto:Howell.Adam@epa.gov]  
**Sent:** Friday, February 06, 2015 3:41 PM  
**To:** Lionel Puhuyesva  
**Subject:** RE: Upcoming EPA inspection & suggested sampling frequency

Okay. I'll see if they can provide that information.

*Adam Howell*  
Clean Water Act Section  
US EPA Region IX  
(415) 947-4248  
[howell.adam@epa.gov](mailto:howell.adam@epa.gov)

---

**From:** Lionel Puhuyesva [mailto:LPuhuyesva@hopi.nsn.us]  
**Sent:** Friday, February 06, 2015 2:39 PM  
**To:** Howell, Adam  
**Subject:** RE: Upcoming EPA inspection & suggested sampling frequency

No I don't that is a BIA water system and I do not have that information.

Lionel

---

**From:** Howell, Adam [mailto:Howell.Adam@epa.gov]  
**Sent:** Friday, February 06, 2015 3:37 PM  
**To:** Lionel Puhuyesva  
**Subject:** RE: Upcoming EPA inspection & suggested sampling frequency

That would be great Lionel! Do you happen to have a map of the nearby drinking water distribution systems and individual drinking water wells you could bring for John to look at?

*Adam Howell*  
Clean Water Act Section  
US EPA Region IX  
(415) 947-4248  
[howell.adam@epa.gov](mailto:howell.adam@epa.gov)

---

**From:** Lionel Puhuyesva [mailto:LPuhuyesva@hopi.nsn.us]  
**Sent:** Friday, February 06, 2015 2:26 PM  
**To:** Howell, Adam; Graves, John; Tinger, John



**Cc:** Todacheene, Melvin; [Honanie.Wendell@bia.gov](mailto:Honanie.Wendell@bia.gov); [ghonanie@hopi.nsn.us](mailto:ghonanie@hopi.nsn.us); Shepherdson, Melanie; [UMowa@hopi.nsn.us](mailto:UMowa@hopi.nsn.us)

**Subject:** RE: Upcoming EPA inspection & suggested sampling frequency

Thank you Adam,

I will be onsite from Water Resources Program so that I can give any recommendations directly from our Program to John Tinger so that EPA will not have to await a response.

---

Lionel Puhuyesva, Director  
Hopi Water Resources Program  
PO Box 123  
Kykotsmovi, AZ 86039  
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(F) 928-734-3609  
[Lpuhuyesva@hopi.nsn.us](mailto:Lpuhuyesva@hopi.nsn.us)

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**From:** Howell, Adam [<mailto:Howell.Adam@epa.gov>]  
**Sent:** Friday, February 06, 2015 2:22 PM  
**To:** Graves, John; Tinger, John  
**Cc:** Todacheene, Melvin; [Honanie.Wendell@bia.gov](mailto:Honanie.Wendell@bia.gov); Lionel Puhuyesva; Gayle Honanie; Shepherdson, Melanie  
**Subject:** RE: Upcoming EPA inspection & suggested sampling frequency

John, Melvin, and Wendell,

I wanted to let you know that a colleague of mine from EPA Region 9, John Tinger, will be traveling to Keams Canyon to do a Compliance Evaluation Inspection. John plans to be onsite between 8:30 and 9:00AM this coming Monday February 9<sup>th</sup>. He can be reached at [Tinger.John@epa.gov](mailto:Tinger.John@epa.gov), or (415) 420-2217. Please make sure you have system operation and facilities management staff available to grant Mr. Tinger access to the facility and answer his questions.

In the event that Wastewater continues to be discharged from Keams Canyon, an accelerated sampling schedule would be useful for understanding environmental and public health impact risks associated with the current situation. I would suggest:

- Daily E. Coli, BOD and TSS testing with sampling occurring alternately at different times of the day, ie. early morning, noon and late afternoon.
- Weekly sampling/testing for TRC, DO, Ammonia, and Temperature.

*Adam Howell*  
Clean Water Act Section  
US EPA Region IX

(415) 947-4248  
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Lionel

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**To:** Howell, Adam; Graves, John; Tinger, John  
**Cc:** Todacheene, Melvin; [Honanie.Wendell@bia.gov](mailto:Honanie.Wendell@bia.gov); [ghonanie@hopi.nsn.us](mailto:ghonanie@hopi.nsn.us); Shepherdson, Melanie; [UMowa@hopi.nsn.us](mailto:UMowa@hopi.nsn.us)  
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[howell.adam@epa.gov](mailto:howell.adam@epa.gov)

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*Adam Howell*  
Clean Water Act Section  
US EPA Region IX  
(415) 947-4248  
[howell.adam@epa.gov](mailto:howell.adam@epa.gov)

---

**From:** Lionel Puhuyesva [<mailto:LPuhuyesva@hopi.nsn.us>]  
**Sent:** Friday, February 06, 2015 2:26 PM  
**To:** Howell, Adam; Graves, John; Tinger, John  
**Cc:** Todacheene, Melvin; [Honanie.Wendell@bia.gov](mailto:Honanie.Wendell@bia.gov); [ghonanie@hopi.nsn.us](mailto:ghonanie@hopi.nsn.us); Shepherdson, Melanie; [UMowa@hopi.nsn.us](mailto:UMowa@hopi.nsn.us)  
**Subject:** RE: Upcoming EPA inspection & suggested sampling frequency

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Lionel Puhuyesva, Director  
Hopi Water Resources Program  
PO Box 123  
Kykotsmovi, AZ 86039  
(T) 928-734-3711  
(F) 928-734-3609  
[Lpuhuyesva@hopi.nsn.us](mailto:Lpuhuyesva@hopi.nsn.us)

\*\*\*\*\*  
**NOTICE**

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**Sent:** Friday, February 06, 2015 2:22 PM  
**To:** Graves, John; Tinger, John  
**Cc:** Todacheene, Melvin; [Honanie.Wendell@bia.gov](mailto:Honanie.Wendell@bia.gov); Lionel Puhuyesva; Gayle Honanie; Shepherdson, Melanie  
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[howell.adam@epa.gov](mailto:howell.adam@epa.gov)

## Howell, Adam

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**From:** Howell, Adam  
**Sent:** Friday, February 06, 2015 2:37 PM  
**To:** Lionel Puhuyesva  
**Subject:** RE: Upcoming EPA inspection & suggested sampling frequency

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**Sent:** Friday, February 06, 2015 2:26 PM  
**To:** Howell, Adam; Graves, John; Tinger, John  
**Cc:** Todacheene, Melvin; Honanie.Wendell@bia.gov; ghonanie@hopi.nsn.us; Shepherdson, Melanie; UMowa@hopi.nsn.us  
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**Sent:** Friday, February 06, 2015 2:22 PM

**To:** Graves, John; Tinger, John

**Cc:** Todacheene, Melvin; [Honanie.Wendell@bia.gov](mailto:Honanie.Wendell@bia.gov); Lionel Puhuyesva; Gayle Honanie; Shepherdson, Melanie

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*Adam Howell*

Clean Water Act Section

US EPA Region IX

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[howell.adam@epa.gov](mailto:howell.adam@epa.gov)



## Howell, Adam

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*Adam Howell*

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(415) 947-4248

[howell.adam@epa.gov](mailto:howell.adam@epa.gov)

## Howell, Adam

---

**From:** Graves, John <john.graves@bia.gov>  
**Sent:** Friday, February 06, 2015 1:59 PM  
**To:** Howell, Adam  
**Subject:** Re: Upcoming EPA inspection & suggested sampling frequency

Thank you Adam, your assistance in this matter is appreciated.

On Fri, Feb 6, 2015 at 2:34 PM, Howell, Adam <[Howell.Adam@epa.gov](mailto:Howell.Adam@epa.gov)> wrote:

Also – I'll be available for coordination from my office. If, for any reason, you have difficulty connecting with John Tinger on Monday, feel free to contact me.

*Adam Howell*

Clean Water Act Section

US EPA Region IX

(415) 947-4248

[howell.adam@epa.gov](mailto:howell.adam@epa.gov)

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**From:** Howell, Adam  
**Sent:** Friday, February 06, 2015 1:22 PM  
**To:** 'Graves, John'; Tinger, John  
**Cc:** 'Todacheene, Melvin'; '[Honanie.Wendell@bia.gov](mailto:Honanie.Wendell@bia.gov)'; '[lpuhuyesva@hopi.nsn.us](mailto:lpuhuyesva@hopi.nsn.us)'; '[GSHonanie@hopi.nsn.us](mailto:GSHonanie@hopi.nsn.us)'; Shepherdson, Melanie  
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--


John F. Graves  
Project Manager / Adviser  
Environmental Science & Therapy, B.S.

---

USDOJ-BIA, Western Regional Office  
Division of Environmental & Cultural Resources  
2600 N. Central Avenue, Phoenix, AZ 85004  
Suite 210. 4th Floor, MS 620-EM

☎ Office (602) 379-3723 ☎ Cell (602) 614-1326

EMS: <https://portal.doi.net/programs/ems/ia/western>

 //Duplex print allowed using 30% post-consumer, recycled content paper //

## Howell, Adam

---

**From:** Howell, Adam  
**Sent:** Friday, February 06, 2015 1:52 PM  
**To:** ghonanie@hopi.nsn.us  
**Subject:** RE: Upcoming EPA inspection & suggested sampling frequency

That would be great Gayl! I'm also putting together a consultation letter for the Chairman. In our last call you mentioned Marilyn Fredericks, Chief of Staff for the Hopi Tribal Council as someone to copy on the letter. Do I have her name and title right?

*Adam Howell*  
Clean Water Act Section  
US EPA Region IX  
(415) 947-4248  
[howell.adam@epa.gov](mailto:howell.adam@epa.gov)

---

**From:** Gayle Honanie [mailto:GHonanie@hopi.nsn.us]  
**Sent:** Friday, February 06, 2015 1:45 PM  
**To:** Howell, Adam; Graves, John; Tinger, John  
**Cc:** Todacheene, Melvin; Honanie.Wendell@bia.gov; lpuhuyesva@hopi.nsn.us; Shepherdson, Melanie  
**Subject:** RE: Upcoming EPA inspection & suggested sampling frequency

Adam:

Thank you for advising us about the compliance visit. I will have one of the environment specialist on site that day from my office.

Gayl

Sent from my T-Mobile 4G LTE Device

----- Original message -----

**From:** "Howell, Adam" <[Howell.Adam@epa.gov](mailto:Howell.Adam@epa.gov)>  
**Date:** 02/06/2015 2:35 PM (GMT-07:00)  
**To:** "Graves, John" <[john.graves@bia.gov](mailto:john.graves@bia.gov)>, "Tinger, John" <[Tinger.John@epa.gov](mailto:Tinger.John@epa.gov)>  
**Cc:** "Todacheene, Melvin" <[melvin.todacheene@bia.gov](mailto:melvin.todacheene@bia.gov)>, Honanie.Wendell@bia.gov, Lionel Puhuyesva <[LPuhuyesva@hopi.nsn.us](mailto:LPuhuyesva@hopi.nsn.us)>, Gayle Honanie <[GHonanie@hopi.nsn.us](mailto:GHonanie@hopi.nsn.us)>, "Shepherdson, Melanie" <[Shepherdson.Melanie@epa.gov](mailto:Shepherdson.Melanie@epa.gov)>  
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## Howell, Adam

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**Sent:** Friday, February 06, 2015 1:45 PM  
**To:** Howell, Adam;Graves, John;Tinger, John  
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**Date:** 02/06/2015 2:35 PM (GMT-07:00)  
**To:** "Graves, John" <john.graves@bia.gov>,"Tinger, John" <Tinger.John@epa.gov>  
**Cc:** "Todacheene, Melvin" <melvin.todacheene@bia.gov>,"Honanie.Wendell@bia.gov","Lionel Puhuyesva <LPuhuyesva@hopi.nsn.us>,"Gayle Honanie <GHonanie@hopi.nsn.us>,"Shepherdson, Melanie" <Shepherdson.Melanie@epa.gov>  
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## Howell, Adam

---

**From:** Graves, John <[john.graves@bia.gov](mailto:john.graves@bia.gov)>  
**Sent:** Thursday, February 05, 2015 4:42 PM  
**To:** Howell, Adam  
**Subject:** Re: Keams WWTP Renewal Docs  
**Attachments:** 2013-2014 Analytical Summary Table.xlsx

[attached..](#)

[thanks adam.](#)

On Thu, Feb 5, 2015 at 4:16 PM, Howell, Adam <[Howell.Adam@epa.gov](mailto:Howell.Adam@epa.gov)> wrote:

Hey John,

Could you please resend the table you mentioned below? It didn't come through in your email.

*Adam Howell*

Clean Water Act Section

US EPA Region IX

(415) 947-4248

[howell.adam@epa.gov](mailto:howell.adam@epa.gov)

**From:** Graves, John [mailto:[john.graves@bia.gov](mailto:john.graves@bia.gov)]  
**Sent:** Tuesday, February 03, 2015 4:38 PM  
**To:** Howell, Adam  
**Cc:** Carolyn Richards  
**Subject:** Fwd: Keams WWTP Renewal Docs

----- Forwarded message -----

From: Graves, John <[john.graves@bia.gov](mailto:john.graves@bia.gov)>  
Date: Tuesday, February 3, 2015  
Subject: Keams WWTP Renewal Docs  
To: Wendell Honanie <[Wendell.Honanie@bia.gov](mailto:Wendell.Honanie@bia.gov)>

Cc: Erwin Kaisem <[erwin.kaisem@bia.gov](mailto:erwin.kaisem@bia.gov)>, John Krause <[john.krause@bia.gov](mailto:john.krause@bia.gov)>, Kendrick Mahle <[kendrick.mahle@bia.gov](mailto:kendrick.mahle@bia.gov)>, Dennis Rodriguez <[dennis.rodriguez@bia.gov](mailto:dennis.rodriguez@bia.gov)>, Phillip Sarracino <[phillip.sarracino@bia.gov](mailto:phillip.sarracino@bia.gov)>, "Stevens, Eldine" <[eldine.stevens@bie.edu](mailto:eldine.stevens@bie.edu)>, "Talayumptewa, Velma" <[velma.talayumptewa@bia.gov](mailto:velma.talayumptewa@bia.gov)>, Michael Redhair <[michael.redhair@bia.gov](mailto:michael.redhair@bia.gov)>, Melvin Todacheene <[Melvin.Todacheene@bia.gov](mailto:Melvin.Todacheene@bia.gov)>, hepaya <[hepvaya@yahoo.com](mailto:hepvaya@yahoo.com)>, [sheth.gary@epa.gov](mailto:sheth.gary@epa.gov)

Wendell,

Attached you will find NPDES Forms #1 and #2A. Both need to be printed, reviewed, signed and then mailed hardcopy with original signature to USEPA Region 9 at the address below:

David W. Smityh

NPDES Permits Section (WTR-2-3)

Water Division

USEPA Region 9

75 Hawthorne Street

San Francisco, CA 94105

Tel: 415.972.3464

Also, please find attached analytical test results for influent and/or effluent samples collected monthly since April, 2013. I have no other data available, but am hopeful this information is forthcoming. The analytical report file should also be printed (double sided) and submitted to USEPA with the permit application package. I have created the table below to summarize the analytical results for this monitoring period:

</mail/u/0/s/?view=att&th=14b5162942413bbe&attid=0.0.1&disp=emb&realattid=ii\_14b51551db69a04b&zw&atsh=1>

Thank you. Please let me know if you have any questions.

--

John F. Graves

Project Manager / Adviser

Environmental Science & Therapy, B.S.

---

USDOI-BIA, Western Regional Office

Division of Environmental & Cultural Resources

2600 N. Central Avenue, Phoenix, AZ 85004

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--

John F. Graves

Project Manager / Adviser

Environmental Science & Therapy, B.S.

---

USDOI-BIA, Western Regional Office

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## Howell, Adam

---

**From:** Graves, John <john.graves@bia.gov>  
**Sent:** Thursday, February 05, 2015 2:40 PM  
**To:** Howell, Adam  
**Subject:** violations?

1. Future discharges to surface water body(s) of the US without a valid NPDES Permit (ongoing)
2. Prior discharges to surface water body(s) of the US without a valid NPDES Permit (since October, 2014)
3. Occurrence(s) of effluent above permitted effluent limitations (at least 11 violations, since April 2013)
4. Failure to submit an NPDES Permit application to EPA 6 months prior to expiration of the existing Permit
5. Failure to submit quarterly Discharge Monitoring Reports to EPA in accordance with Permit requirements (each quarter since January, 2011)
6. Failure to submit monthly analytical test results with quarterly DMRS (each month since November, 2010)
7. Failure to monitor effluent parameters in accordance with Permit requirements
8. Failure to operate and maintain the permitted facility to achieve compliance and conditions of the Permit
9. Failure to notify and report to EPA within 24 hours any condition which may endanger human health and/or the environment
10. Failure to submit an Annual Biosolids Monitoring Report (since 2010)
11. Failure to mitigate or prevent any discharge in violation of the Permit

--


John F. Graves  
Project Manager / Adviser  
Environmental Science & Therapy, B.S.

---

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## Howell, Adam

---

**From:** Graves, John <john.graves@bia.gov>  
**Sent:** Thursday, February 05, 2015 11:02 AM  
**To:** Howell, Adam  
**Subject:** Fwd:  
**Attachments:** 20150204\_162712.jpg; 20150204\_162650.jpg; 20150204\_162636.jpg; 20150204\_162625.jpg

----- Forwarded message -----

From: John Graves <[jfgraves3@gmail.com](mailto:jfgraves3@gmail.com)>  
Date: Thursday, February 5, 2015  
Subject:  
To: [john.graves@bia.gov](mailto:john.graves@bia.gov)

--


John F. Graves  
Project Manager / Adviser  
Environmental Science & Therapy, B.S.

---

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## Howell, Adam

---

**From:** Graves, John <john.graves@bia.gov>  
**Sent:** Thursday, February 05, 2015 11:03 AM  
**To:** Howell, Adam  
**Subject:** Fwd:  
**Attachments:** 20150204\_162539.jpg; 20150204\_162536.jpg; 20150204\_162529.jpg; 20150204\_162157.jpg

----- Forwarded message -----

From: John Graves <[jfgraves3@gmail.com](mailto:jfgraves3@gmail.com)>  
Date: Thursday, February 5, 2015  
Subject:  
To: [john.graves@bia.gov](mailto:john.graves@bia.gov)

--


John F. Graves  
Project Manager / Adviser  
Environmental Science & Therapy, B.S.

---

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## Howell, Adam

---

**From:** Graves, John <john.graves@bia.gov>  
**Sent:** Thursday, February 05, 2015 10:40 AM  
**To:** Howell, Adam  
**Subject:** Fwd:  
**Attachments:** 20150204\_162117.jpg; 20150204\_162136.jpg; 20150204\_162145.jpg

----- Forwarded message -----

From: **John Graves** <[jfgraves3@gmail.com](mailto:jfgraves3@gmail.com)>  
Date: Thu, Feb 5, 2015 at 11:37 AM  
Subject: Re:  
To: [john.graves@bia.gov](mailto:john.graves@bia.gov)

--


John F. Graves  
Project Manager / Adviser  
Environmental Science & Therapy, B.S.

---

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## Howell, Adam

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**From:** Graves, John <john.graves@bia.gov>  
**Sent:** Thursday, February 05, 2015 10:34 AM  
**To:** Howell, Adam  
**Subject:** Fwd:  
**Attachments:** 20150204\_174406.jpg; 20150204\_174403.jpg; 20150204\_174354.jpg; 20150204\_173901.jpg; 20150204\_173845.jpg; 20150204\_162722.jpg

----- Forwarded message -----

From: **John Graves** <[jfgraves3@gmail.com](mailto:jfgraves3@gmail.com)>  
Date: Thu, Feb 5, 2015 at 11:11 AM  
Subject:  
To: [john.graves@bia.gov](mailto:john.graves@bia.gov)

--

John F. Graves  
Project Manager / Adviser  
Environmental Science & Therapy, B.S.

---

USDOJ-BIA, Western Regional Office  
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## Howell, Adam

---

**From:** Howell, Adam  
**Sent:** Wednesday, February 04, 2015 9:34 AM  
**To:** Sheth, Gary  
**Subject:** RE: Keams WWTP Renewal Docs

Okay. Thanks!

*Adam Howell*  
Clean Water Act Section  
US EPA Region IX  
(415) 947-4248  
[howell.adam@epa.gov](mailto:howell.adam@epa.gov)

---

**From:** Sheth, Gary  
**Sent:** Wednesday, February 04, 2015 9:33 AM  
**To:** Howell, Adam  
**Subject:** RE: Keams WWTP Renewal Docs

Adam,

Actually I was sent this. I am the last name on the email that John sent out...☺

I didn't forward to you because these were still DRAFT. The actual packet should be coming to Dave today or tomorrow.

Gary

---

**From:** Howell, Adam  
**Sent:** Tuesday, February 03, 2015 4:51 PM  
**To:** Sheth, Gary  
**Subject:** FW: Keams WWTP Renewal Docs

Gary – Not sure why you weren't copied on this.

*Adam Howell*  
Clean Water Act Section  
US EPA Region IX  
(415) 947-4248  
[howell.adam@epa.gov](mailto:howell.adam@epa.gov)

**From:** Graves, John [<mailto:john.graves@bia.gov>]  
**Sent:** Tuesday, February 03, 2015 4:38 PM  
**To:** Howell, Adam  
**Cc:** Carolyn Richards  
**Subject:** Fwd: Keams WWTP Renewal Docs

----- Forwarded message -----

From: Graves, John <[john.graves@bia.gov](mailto:john.graves@bia.gov)>

Date: Tuesday, February 3, 2015

Subject: Keams WWTP Renewal Docs

To: Wendell Honanie <[Wendell.Honanie@bia.gov](mailto:Wendell.Honanie@bia.gov)>

Cc: Erwin Kaisem <[erwin.kaisem@bia.gov](mailto:erwin.kaisem@bia.gov)>, John Krause <[john.krause@bia.gov](mailto:john.krause@bia.gov)>, Kendrick Mahle <[kendrick.mahle@bia.gov](mailto:kendrick.mahle@bia.gov)>, Dennis Rodriguez <[dennis.rodriguez@bia.gov](mailto:dennis.rodriguez@bia.gov)>, Phillip Sarracino <[phillip.sarracino@bia.gov](mailto:phillip.sarracino@bia.gov)>, "Stevens, Eldine" <[eldine.stevens@bie.edu](mailto:eldine.stevens@bie.edu)>, "Talayumtewa, Velma" <[velma.talayumtewa@bia.gov](mailto:velma.talayumtewa@bia.gov)>, Michael Redhair <[michael.redhair@bia.gov](mailto:michael.redhair@bia.gov)>, Melvin Todacheene <[Melvin.Todacheene@bia.gov](mailto:Melvin.Todacheene@bia.gov)>, hepvaya <[hepvaya@yahoo.com](mailto:hepvaya@yahoo.com)>, [sheth.gary@epa.gov](mailto:sheth.gary@epa.gov)

Wendell,

Attached you will find NPDES Forms #1 and #2A. Both need to be printed, reviewed, signed and then mailed hardcopy with original signature to USEPA Region 9 at the address below:

David W. Smityh

NPDES Permits Section (WTR-2-3)

Water Division

USEPA Region 9

75 Hawthorne Street

San Francisco, CA 94105

Tel: 415.972.3464

Also, please find attached analytical test results for influent and/or effluent samples collected monthly since April, 2013. I have no other data available, but am hopeful this information is forthcoming. The analytical report file should also be printed (double sided) and submitted to USEPA with the permit application package. I have created the table below to summarize the analytical results for this monitoring period:

</mail/u/0/s/?view=att&th=14b5162942413bbe&attid=0.0.1&disp=emb&realattid=ii\_14b51551db69a04b&zw&atsh=1>

Thank you. Please let me know if you have any questions.

--

John F. Graves

Project Manager / Adviser

Environmental Science & Therapy, B.S.

---

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John F. Graves

Project Manager / Adviser


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## Howell, Adam

---

**From:** Graves, John <john.graves@bia.gov>  
**Sent:** Tuesday, February 03, 2015 5:00 PM  
**To:** Howell, Adam  
**Subject:** Travel status: Active RE: Keams WWTP Renewal Docs

It may be possible to reach me at 602.614.1326.

--

John F. Graves  
Project Manager / Adviser  
Environmental Science & Therapy, B.S.

---

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Division of Environmental & Cultural Resources  
2600 N. Central Avenue, Phoenix, AZ 85004 Suite 210. 4th Floor , MS 620-EM  
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<<https://portal.doi.net/programs/ems/ia/western>>\*  
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## Howell, Adam

---

**From:** Howell, Adam  
**Sent:** Tuesday, February 03, 2015 4:59 PM  
**To:** Graves, John  
**Subject:** RE: Keams WWTP Renewal Docs

John,

Sorry Gary and I missed you today. I guess you two had a miscommunication about time zones? It looks like we've both been invited to the same call tomorrow so we may be able to talk then. Thank you for providing the permit application document and lab analytical reports. Your email mentions a table, but I am not seeing it. Can you please try sending it again?

*Adam Howell*  
Clean Water Act Section  
US EPA Region IX  
(415) 947-4248  
[howell.adam@epa.gov](mailto:howell.adam@epa.gov)

**From:** Graves, John [mailto:[john.graves@bia.gov](mailto:john.graves@bia.gov)]  
**Sent:** Tuesday, February 03, 2015 4:38 PM  
**To:** Howell, Adam  
**Cc:** Carolyn Richards  
**Subject:** Fwd: Keams WWTP Renewal Docs

----- Forwarded message -----

From: Graves, John <[john.graves@bia.gov](mailto:john.graves@bia.gov)>  
Date: Tuesday, February 3, 2015  
Subject: Keams WWTP Renewal Docs  
To: Wendell Honanie <[Wendell.Honanie@bia.gov](mailto:Wendell.Honanie@bia.gov)>  
Cc: Erwin Kaisem <[erwin.kaisem@bia.gov](mailto:erwin.kaisem@bia.gov)>, John Krause <[john.krause@bia.gov](mailto:john.krause@bia.gov)>, Kendrick Mahle <[kendrick.mahle@bia.gov](mailto:kendrick.mahle@bia.gov)>, Dennis Rodriguez <[dennis.rodriguez@bia.gov](mailto:dennis.rodriguez@bia.gov)>, Phillip Sarracino <[phillip.sarracino@bia.gov](mailto:phillip.sarracino@bia.gov)>, "Stevens, Eldine" <[eldine.stevens@bie.edu](mailto:eldine.stevens@bie.edu)>, "Talayumtewa, Velma" <[velma.talayumtewa@bia.gov](mailto:velma.talayumtewa@bia.gov)>, Michael Redhair <[michael.redhair@bia.gov](mailto:michael.redhair@bia.gov)>, Melvin Todacheene <[Melvin.Todacheene@bia.gov](mailto:Melvin.Todacheene@bia.gov)>, hepvaya <[hepvaya@yahoo.com](mailto:hepvaya@yahoo.com)>, [sheth.gary@epa.gov](mailto:sheth.gary@epa.gov)

Wendell,  
Attached you will find NPDES Forms #1 and #2A. Both need to be printed, reviewed, signed and then mailed hardcopy with original signature to USEPA Region 9 at the address below:  
David W. Smityh  
NPDES Permits Section (WTR-2-3)  
Water Division  
USEPA Region 9  
75 Hawthorne Street  
San Francisco, CA 94105  
Tel: 415.972.3464

Also, please find attached analytical test results for influent and/or effluent samples collected monthly since April, 2013. I have no other data available, but am hopeful this information is forthcoming. The analytical report file should also be printed (double sided) and submitted to USEPA with the permit application package. I have created the table below to summarize the analytical results for this monitoring period:  
</mail/u/0/s/?view=att&th=14b5162942413bbe&attid=0.0.1&disp=emb&realattid=ii\_14b51551db69a04b&zw&atsh=1>

Thank you. Please let me know if you have any questions.

--

John F. Graves  
Project Manager / Adviser  
Environmental Science & Therapy, B.S.


---

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John F. Graves  
Project Manager / Adviser  
Environmental Science & Therapy, B.S.

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## Howell, Adam

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**From:** Graves, John <[john.graves@bia.gov](mailto:john.graves@bia.gov)>  
**Sent:** Tuesday, February 03, 2015 4:38 PM  
**To:** Howell, Adam  
**Cc:** Carolyn Richards  
**Subject:** Fwd: Keams WWTP Renewal Docs  
**Attachments:** Keams Canon WWTP NPDES Form 1 Final.pdf; Keams Canon WWTP NPDES Form 2A Final.pdf; 2013-2014 Analytical Reports.pdf

----- Forwarded message -----

From: Graves, John <[john.graves@bia.gov](mailto:john.graves@bia.gov)>  
Date: Tuesday, February 3, 2015  
Subject: Keams WWTP Renewal Docs  
To: Wendell Honanie <[Wendell.Honanie@bia.gov](mailto:Wendell.Honanie@bia.gov)>  
Cc: Erwin Kaisem <[erwin.kaisem@bia.gov](mailto:erwin.kaisem@bia.gov)>, John Krause <[john.krause@bia.gov](mailto:john.krause@bia.gov)>, Kendrick Mahle <[kendrick.mahle@bia.gov](mailto:kendrick.mahle@bia.gov)>, Dennis Rodriguez <[dennis.rodriguez@bia.gov](mailto:dennis.rodriguez@bia.gov)>, Phillip Sarracino <[phillip.sarracino@bia.gov](mailto:phillip.sarracino@bia.gov)>, "Stevens, Eldine" <[eldine.stevens@bie.edu](mailto:eldine.stevens@bie.edu)>, "Talayumtewa, Velma" <[velma.talayumtewa@bia.gov](mailto:velma.talayumtewa@bia.gov)>, Michael Redhair <[michael.redhair@bia.gov](mailto:michael.redhair@bia.gov)>, Melvin Todacheene <[Melvin.Todacheene@bia.gov](mailto:Melvin.Todacheene@bia.gov)>, hepvaya <[hepvaya@yahoo.com](mailto:hepvaya@yahoo.com)>, [sheth.gary@epa.gov](mailto:sheth.gary@epa.gov)

Wendell,

Attached you will find NPDES Forms #1 and #2A. Both need to be printed, reviewed, signed and then mailed hardcopy with original signature to USEPA Region 9 at the address below:

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NPDES Permits Section (WTR-2-3)  
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Tel: 415.972.3464

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</mail/u/0/s/?view=att&th=14b5162942413bbe&attid=0.0.1&disp=emb&realattid=ii\_14b51551db69a04b&zw&atsh=1>

Thank you. Please let me know if you have any questions.

--

John F. Graves  
Project Manager / Adviser  
Environmental Science & Therapy, B.S.

---

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John F. Graves  
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EMS: <https://portal.doi.net/programs/ems/ia/western>

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**From:** Graves, John [mailto:[john.graves@bia.gov](mailto:john.graves@bia.gov)]  
**Sent:** Tuesday, January 27, 2015 12:52 PM  
**To:** Howell, Adam  
**Subject:** Please call Re: BIA Keams Canyon WWTP

Adam,

I don't know your phone number, though I would like to chat with you in this regard. The Superintendent, Hopi Agency provided me your name and said that Facility Manager Melvin Todacheene is working with you for renewal of the expired NPDES permit for the facility.

Thanks, call when you can.

--

John F. Graves

Project Manager / Adviser

Environmental Science & Therapy, B.S.

---

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John F. Graves

Project Manager / Adviser

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## Howell, Adam

---

**From:** Graves, John <john.graves@bia.gov>  
**Sent:** Thursday, January 29, 2015 10:21 AM  
**To:** Howell, Adam  
**Subject:** Re: Keams Canyon WWTP Update

I'm on this Adam. I've been tasked with the NPDES prep/submission as well, as I had hoped.

On Wednesday, January 28, 2015, Howell, Adam <[Howell.Adam@epa.gov](mailto:Howell.Adam@epa.gov)> wrote:

> Can you please find out conclusively and let me know?

>

>

>

> Adam Howell

>

> Clean Water Act Enforcement

>

> US EPA Region IX

>

> (415) 947-4248

>

> [howell.adam@epa.gov](mailto:howell.adam@epa.gov)

>

>

>

> From: Graves, John [mailto:[john.graves@bia.gov](mailto:john.graves@bia.gov)]

> Sent: Wednesday, January 28, 2015 4:24 PM

> To: Howell, Adam

> Subject: Re: Keams Canyon WWTP Update

>

>

>

> I really hope so Adam. I really really do.

>

>

>

> On Wed, Jan 28, 2015 at 4:55 PM, Howell, Adam <[Howell.Adam@epa.gov](mailto:Howell.Adam@epa.gov)> wrote:

>

> John,

>

>

>

> Yes you can send me the lab reports via email, but that does not negate the need to submit DMRs as soon as possible. The lab analytical reports should also be kept with the facility records for the time period specified in the permit. Was sampling and analysis being conducted between October 2010 and April 2013?

>

>

>


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> John F. Graves  
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> Project Manager / Adviser  
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--  
John F. Graves  
Project Manager / Adviser  
Environmental Science & Therapy, B.S.

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EMS: <https://portal.doi.net/programs/ems/ia/western>

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## Howell, Adam

---

**From:** Howell, Adam  
**Sent:** Wednesday, January 28, 2015 6:21 PM  
**To:** Graves, John  
**Subject:** RE: Keams Canyon WWTP Update

Can you please find out conclusively and let me know?

*Adam Howell*  
Clean Water Act Enforcement  
US EPA Region IX  
(415) 947-4248  
[howell.adam@epa.gov](mailto:howell.adam@epa.gov)

**From:** Graves, John [mailto:[john.graves@bia.gov](mailto:john.graves@bia.gov)]  
**Sent:** Wednesday, January 28, 2015 4:24 PM  
**To:** Howell, Adam  
**Subject:** Re: Keams Canyon WWTP Update

I really hope so Adam. I really really do.

On Wed, Jan 28, 2015 at 4:55 PM, Howell, Adam <[Howell.Adam@epa.gov](mailto:Howell.Adam@epa.gov)> wrote:

John,

Yes you can send me the lab reports via email, but that does not negate the need to submit DMRs as soon as possible. The lab analytical reports should also be kept with the facility records for the time period specified in the permit. Was sampling and analysis being conducted between October 2010 and April 2013?

Thanks again for keeping me posted!

*Adam Howell*  
Clean Water Act Enforcement  
US EPA Region IX  
(415) 947-4248  
[howell.adam@epa.gov](mailto:howell.adam@epa.gov)

**From:** Graves, John [mailto:[john.graves@bia.gov](mailto:john.graves@bia.gov)]  
**Sent:** Wednesday, January 28, 2015 3:40 PM

## Howell, Adam

---

**From:** Graves, John <john.graves@bia.gov>  
**Sent:** Tuesday, January 27, 2015 4:22 PM  
**To:** Howell, Adam  
**Subject:** Re: FW: Hopi Keams Canyon  
**Attachments:** Keams WWTP.pdf

Keams Canyon Agency Utility Layout attached. thanks for the chat.

On Tue, Jan 27, 2015 at 4:38 PM, Howell, Adam <[Howell.Adam@epa.gov](mailto:Howell.Adam@epa.gov)> wrote:

New permit application.

*Adam Howell*

Clean Water Act Enforcement

US EPA Region IX

(415) 947-4248

[howell.adam@epa.gov](mailto:howell.adam@epa.gov)

---

**From:** Sheth, Gary  
**Sent:** Tuesday, January 27, 2015 8:50 AM  
**To:** [melvin.todacheene@bia.gov](mailto:melvin.todacheene@bia.gov)  
**Cc:** Howell, Adam; Lee, Bessie  
**Subject:** Hopi Keams Canyon

Good Morning Melvin,

Thank you for your call yesterday. Yes the NPDES permit is currently expired. It expired in September 2014.

As requested I am sending you links both to the old permit and factsheet and to the application forms you need to reapply for the NPDES permit.



<http://www.epa.gov/region9/water/npdes/pdf/az/BIA-Hopi-KeamsCanyon-permit.pdf>

<http://www.epa.gov/region9/water/npdes/pdf/az/BIA-Hopi-KeamsCanyon-factsheet.pdf>

[http://water.epa.gov/polwaste/npdes/basics/upload/form\\_1.pdf](http://water.epa.gov/polwaste/npdes/basics/upload/form_1.pdf)

<http://water.epa.gov/polwaste/npdes/basics/upload/final2a.pdf>

In the meantime any leaks, upsets, unauthorized discharges should be reported to Adam Howell in the Compliance Division.

I believe Bessie Lee previously provided you the appropriate contact information yesterday. I have cc:ed Adam here as well.

Thanks,

Gary Sheth

NPDES Permits Section (WTR-2-3)

Water Division

USEPA Region 9

75 Hawthorne Street

San Francisco, CA 94105

Tel: 415.972.3516

Fax: 415.947.3549

--

John F. Graves

Project Manager / Adviser

Environmental Science & Therapy, B.S.

---

USDOJ-BIA, Western Regional Office

Division of Environmental & Cultural Resources

2600 N. Central Avenue, Phoenix, AZ 85004

Suite 210. 4th Floor, MS 620-EM

☎ Office (602) 379-3723 ☎ Cell (602) 614-1326

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damage area and line the lagoon. Please advise if there are other concerns we need to be aware of and address. Thanks.

----- Forwarded message -----

From: **Honanie, Wendell** <wendell.honanie@bia.gov>

Date: Mon, Jan 26, 2015 at 10:11 AM

Subject: BIA Sewer Lagoon Leak in Keams Canyon

To: Gayle Honanie <GSHonanie@hopi.nsn.us>

Cc: chonyumtewa@hopi.nsn.us, Erwin Kaisem <erwin.kaisem@bia.gov>, Melvin Todacheene <Melvin.Todacheene@bia.gov>, Norlene Honyaktewa <norlene.honyaktewa@bia.gov>

This is to notify the Hopi Tribe Environmental Office that the Hopi Agency 3rd Pond lagoon had a leak reported on 1/23/15. The pond liner is deteriorated and was found leaking into the KC wash. As of Friday 1/23/15. The pond cavity where the leak was found was closed and fill in with additional soil. The leak has been secured and now the Agency facility is allowing the lagoon to be drained thru the drain outlet to lower the capacity of the sewer lagoon. The Agency will be notifying the EPA today and is already working with the Regional Office Branch of Facility to determine the emergency plan to mitigate the lagoon cell with new liner. The cell will continue to have the waste water discharge into the wash for several more days. Please contact Mr. Todacheene or myself if you have any questions.

--

Wendell Honanie, Sr.  
Superintendent  
DOI/BIA Hopi Agency  
PO Box 158  
Keams Canyon, Az 86034

Office phone: 928 738-2228  
[Wendell.Honanie@bia.gov](mailto:Wendell.Honanie@bia.gov)

--

Wendell Honanie, Sr.  
Superintendent  
DOI/BIA Hopi Agency  
PO Box 158  
Keams Canyon, Az 86034

Office phone: 928 738-2228  
[Wendell.Honanie@bia.gov](mailto:Wendell.Honanie@bia.gov)

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John F. Graves

Project Manager / Adviser

Environmental Science & Therapy, B.S.

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John F. Graves

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## Howell, Adam

---

**From:** Howell, Adam  
**Sent:** Tuesday, January 27, 2015 3:38 PM  
**To:** Graves, John  
**Subject:** FW: Hopi Keams Canyon

New permit application.

*Adam Howell*  
Clean Water Act Enforcement  
US EPA Region IX  
(415) 947-4248  
[howell.adam@epa.gov](mailto:howell.adam@epa.gov)

---

**From:** Sheth, Gary  
**Sent:** Tuesday, January 27, 2015 8:50 AM  
**To:** melvin.todacheene@bia.gov  
**Cc:** Howell, Adam; Lee, Bessie  
**Subject:** Hopi Keams Canyon

Good Morning Melvin,

Thank you for your call yesterday. Yes the NPDES permit is currently expired. It expired in September 2014.

As requested I am sending you links both to the old permit and factsheet and to the application forms you need to reapply for the NPDES permit.

<http://www.epa.gov/region9/water/npdes/pdf/az/BIA-Hopi-KeamsCanyon-permit.pdf>

<http://www.epa.gov/region9/water/npdes/pdf/az/BIA-Hopi-KeamsCanyon-factsheet.pdf>

[http://water.epa.gov/polwaste/npdes/basics/upload/form\\_1.pdf](http://water.epa.gov/polwaste/npdes/basics/upload/form_1.pdf)

<http://water.epa.gov/polwaste/npdes/basics/upload/final2a.pdf>

In the meantime any leaks, upsets, unauthorized discharges should be reported to Adam Howell in the Compliance Division.

I believe Bessie Lee previously provided you the appropriate contact information yesterday. I have cc:ed Adam here as well.

Thanks,

Gary Sheth  
NPDES Permits Section (WTR-2-3)  
Water Division  
USEPA Region 9  
75 Hawthorne Street  
San Francisco, CA 94105

Tel: 415.972.3516

Fax: 415.947.3549

## Howell, Adam

---

**From:** Graves, John <john.graves@bia.gov>  
**Sent:** Tuesday, January 27, 2015 3:31 PM  
**To:** Howell, Adam  
**Subject:** Re: Please call Re: BIA Keams Canyon WWTP  
**Attachments:** aerial photo.pdf

On Tue, Jan 27, 2015 at 4:27 PM, Howell, Adam <[Howell.Adam@epa.gov](mailto:Howell.Adam@epa.gov)> wrote:

Here are the standard conditions.

*Adam Howell*

Clean Water Act Enforcement

US EPA Region IX

(415) 947-4248

[howell.adam@epa.gov](mailto:howell.adam@epa.gov)

**From:** Graves, John [mailto:[john.graves@bia.gov](mailto:john.graves@bia.gov)]  
**Sent:** Tuesday, January 27, 2015 12:52 PM  
**To:** Howell, Adam  
**Subject:** Please call Re: BIA Keams Canyon WWTP

Adam,

I don't know your phone number, though I would like to chat with you in this regard. The Superintendent, Hopi Agency provided me your name and said that Facility Manager Melvin Todacheene is working with you for renewal of the expired NPDES permit for the facility.

Thanks, call when you can.

--

John F. Graves

Project Manager / Adviser

Environmental Science & Therapy, B.S.

---

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John F. Graves

Project Manager / Adviser

Environmental Science & Therapy, B.S.

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## Howell, Adam

---

**From:** Howell, Adam  
**Sent:** Tuesday, January 27, 2015 3:28 PM  
**To:** Graves, John  
**Subject:** RE: Please call Re: BIA Keams Canyon WWTP  
**Attachments:** Standard Permit Conditions 2002.pdf

Here are the standard conditions.

*Adam Howell*  
Clean Water Act Enforcement  
US EPA Region IX  
(415) 947-4248  
[howell.adam@epa.gov](mailto:howell.adam@epa.gov)

**From:** Graves, John [mailto:[john.graves@bia.gov](mailto:john.graves@bia.gov)]  
**Sent:** Tuesday, January 27, 2015 12:52 PM  
**To:** Howell, Adam  
**Subject:** Please call Re: BIA Keams Canyon WWTP

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Thanks, call when you can.

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John F. Graves  
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Environmental Science & Therapy, B.S.

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## Howell, Adam

---

**From:** Howell, Adam  
**Sent:** Tuesday, January 27, 2015 1:54 PM  
**To:** Graves, John  
**Subject:** RE: Please call Re: BIA Keams Canyon WWTP

Hello John – Thank you for your email. I just left you a phone message. Please call me as soon as possible at the number in my signature block.

*Adam Howell*  
Clean Water Act Enforcement  
US EPA Region IX  
(415) 947-4248  
[howell.adam@epa.gov](mailto:howell.adam@epa.gov)

**From:** Graves, John [mailto:john.graves@bia.gov]  
**Sent:** Tuesday, January 27, 2015 12:52 PM  
**To:** Howell, Adam  
**Subject:** Please call Re: BIA Keams Canyon WWTP

Adam,

I don't know your phone number, though I would like to chat with you in this regard. The Superintendent, Hopi Agency provided me your name and said that Facility Manager Melvin Todacheene is working with you for renewal of the expired NPDES permit for the facility.

Thanks, call when you can.

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John F. Graves  
Project Manager / Adviser  
Environmental Science & Therapy, B.S.

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## Howell, Adam

---

**From:** Howell, Adam  
**Sent:** Tuesday, January 27, 2015 1:36 PM  
**To:** Todacheene, Melvin  
**Subject:** RE: Public Announcement

Thanks for sharing Melvin – You might consider also asking the public to take water conservation measures in order to reduce the flow into the system. Less wastewater going into the lagoons right now could mean less unauthorized discharge and might make the logistics of the repair easier.

*Adam Howell*

Clean Water Act Enforcement  
US EPA Region IX  
(415) 947-4248  
[howell.adam@epa.gov](mailto:howell.adam@epa.gov)

**From:** Todacheene, Melvin [mailto:[melvin.todacheene@bia.gov](mailto:melvin.todacheene@bia.gov)]  
**Sent:** Tuesday, January 27, 2015 1:30 PM  
**To:** Howell, Adam  
**Subject:** Fwd: Public Announcement

Attached is the PUBLIC SERVICE ANNOUNCEMENT to be aired by the KUYI Radio station.

----- Forwarded message -----

**From:** Talayumptewa, Velma <[velma.talayumptewa@bia.gov](mailto:velma.talayumptewa@bia.gov)>  
**Date:** Tue, Jan 27, 2015 at 1:04 PM  
**Subject:** Fwd: Public Announcement  
**To:** Melvin Todacheene <[melvin.todacheene@bia.gov](mailto:melvin.todacheene@bia.gov)>

See attachment. Corrected the phone number for Philbert Poseyesva.

----- Forwarded message -----

**From:** Talayumptewa, Velma <[velma.talayumptewa@bia.gov](mailto:velma.talayumptewa@bia.gov)>  
**Date:** Tue, Jan 27, 2015 at 11:23 AM  
**Subject:** Public Announcement  
**To:** [info@kuyi.net](mailto:info@kuyi.net)

Attached is the PA we would like aired daily until the problem has been resolved. if you have any questions, you may call any of the numbers listed in the PA.

--

*Velma Talayumptewa, Secretary*  
*BIA, Hopi Agency*  
*P.O. Box 158*  
*Keams Canyon, AZ 86034*  
*928-738-2228 and 928-738-5522 (fax)*

--

*Velma Talayumptewa, Secretary*  
*BIA, Hopi Agency*  
*P.O. Box 158*  
*Keams Canyon, AZ 86034*  
*928-738-2228 and 928-738-5522 (fax)*

## Howell, Adam

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**From:** Todacheene, Melvin <melvin.todacheene@bia.gov>  
**Sent:** Tuesday, January 27, 2015 1:30 PM  
**To:** Howell, Adam  
**Subject:** Fwd: Public Announcement  
**Attachments:** Jan 27 2015 PA KC lagoon.doc

Attached is the PUBLIC SERVICE ANNOUNCEMENT to be aired by the KUYI Radio station.

----- Forwarded message -----

**From:** Talayumptewa, Velma <[velma.talayumptewa@bia.gov](mailto:velma.talayumptewa@bia.gov)>  
**Date:** Tue, Jan 27, 2015 at 1:04 PM  
**Subject:** Fwd: Public Announcement  
**To:** Melvin Todacheene <[melvin.todacheene@bia.gov](mailto:melvin.todacheene@bia.gov)>

See attachment. Corrected the phone number for Philbert Poseyesva.

----- Forwarded message -----

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**To:** [info@kuyi.net](mailto:info@kuyi.net)

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BIA, Hopi Agency  
P.O. Box 158  
Keams Canyon, AZ 86034  
928-738-2228 and 928-738-5522 (fax)*

## Howell, Adam

---

**From:** Graves, John <john.graves@bia.gov>  
**Sent:** Tuesday, January 27, 2015 12:52 PM  
**To:** Howell, Adam  
**Subject:** Please call Re: BIA Keams Canyon WWTP

Adam,

I don't know your phone number, though I would like to chat with you in this regard. The Superintendent, Hopi Agency provided me your name and said that Facility Manager Melvin Todacheene is working with you for renewal of the expired NPDES permit for the facility.

Thanks, call when you can.

--

John F. Graves  
Project Manager / Adviser  
Environmental Science & Therapy, B.S.

---

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## Howell, Adam

---

**From:** Howell, Adam  
**Sent:** Tuesday, January 27, 2015 9:38 AM  
**To:** Todacheene, Melvin  
**Subject:** RE: Keams Canyon Sewer Lagoon

Melvin – I'll be in the office all day today, but in and out of meetings. I tried calling, but Hubert said you were in the superintendent's office and I couldn't reach you there. Please try calling me as soon as you are available. If I don't answer, leave a message with a good time to call you.

Thank you,

*Adam Howell*  
Clean Water Act Enforcement  
US EPA Region IX  
(415) 947-4248  
[howell.adam@epa.gov](mailto:howell.adam@epa.gov)

**From:** Todacheene, Melvin [mailto:[melvin.todacheene@bia.gov](mailto:melvin.todacheene@bia.gov)]  
**Sent:** Tuesday, January 27, 2015 7:08 AM  
**To:** Howell, Adam  
**Cc:** Honanie.Wendell@bia.gov  
**Subject:** Re: Keams Canyon Sewer Lagoon

What Time will you be in the office. Our Arizona time is now 8:07 a.m. please let me know on the time for me to call call you.

On Mon, Jan 26, 2015 at 4:57 PM, Howell, Adam <[Howell.Adam@epa.gov](mailto:Howell.Adam@epa.gov)> wrote:

Mr. Todacheene,

Thank you for your email. Please contact me as soon as possible at the number below. I have a number of questions for you.

Best Regards,

*Adam Howell*  
Clean Water Act Enforcement  
US EPA Region IX  
(415) 947-4248

**From:** Todacheene, Melvin [mailto:[melvin.todacheene@bia.gov](mailto:melvin.todacheene@bia.gov)]  
**Sent:** Monday, January 26, 2015 3:19 PM  
**To:** Howell, Adam  
**Subject:** Keams Canyon Sewer Lagoon

January 22, 2015 one of the Facilities Management staff notice leakage through the dike at the sewer lagoon, with the crew we stop leakage by building dirt dike at the water level that stop the leakage, Then on Friday we started locating the cavity in the dike which we found repack the dike for now and also Western Region Facilities Management office have contacted a contractor out of Showlow, Az the contract stop by Friday. Western Region Facilities Management office is work on getting cost estimate for the repair of the lagoon.

if there's any question you may contact at 928- 738-2207 or 2315.



## Howell, Adam

---

**From:** Sheth, Gary  
**Sent:** Tuesday, January 27, 2015 8:50 AM  
**To:** melvin.todacheene@bia.gov  
**Cc:** Howell, Adam; Lee, Bessie  
**Subject:** Hopi Keams Canyon

Good Morning Melvin,

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[http://water.epa.gov/polwaste/npdes/basics/upload/form\\_1.pdf](http://water.epa.gov/polwaste/npdes/basics/upload/form_1.pdf)

<http://water.epa.gov/polwaste/npdes/basics/upload/final2a.pdf>

In the meantime any leaks, upsets, unauthorized discharges should be reported to Adam Howell in the Compliance Division.

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Thanks,

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75 Hawthorne Street  
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Tel: 415.972.3516  
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## Howell, Adam

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Best Regards,

*Adam Howell*

Clean Water Act Enforcement

US EPA Region IX

(415) 947-4248

[howell.adam@epa.gov](mailto:howell.adam@epa.gov)

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**To:** Howell, Adam  
**Subject:** Keams Canyon Sewer Lagoon

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that stop the leakage, Then on Friday we started locating the cavity in the dike which we found

repack the dike for now and also Western Region Facilities Management office have contacted a contractor out of Showlow, Az the contract stop by Friday. Western Region Facilities Management office is work on getting cost estimate for the repair of the lagoon.

if there's any question you may contact at 928- 738-2207 or 2315.

## Howell, Adam

---

**From:** Howell, Adam  
**Sent:** Monday, January 26, 2015 3:57 PM  
**To:** Todacheene, Melvin  
**Cc:** Honanie.Wendell@bia.gov  
**Subject:** RE: Keams Canyon Sewer Lagoon

Mr. Todacheene,

Thank you for your email. Please contact me as soon as possible at the number below. I have a number of questions for you.

Best Regards,

*Adam Howell*  
Clean Water Act Enforcement  
US EPA Region IX  
(415) 947-4248  
[howell.adam@epa.gov](mailto:howell.adam@epa.gov)

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**To:** Howell, Adam  
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## Howell, Adam

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**To:** Howell, Adam  
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if there's any question you may contact at 928- 738-2207 or 2315.

**Howell, Adam**

---

**From:** Graves, John <[john.graves@bia.gov](mailto:john.graves@bia.gov)>  
**Sent:** Tuesday, March 03, 2015 3:24 PM  
**To:** Sheth, Gary; Tran, Linh  
**Cc:** Howell, Adam; John Krause; Erwin Kaisem; Kendrick Mahle  
**Subject:** Re: BIA Keams Wastewater Priority Pollutant & Eff. Parameter Test Results (02/15)  
**Attachments:** 2015\_Feb Water Quality Parameters, Asbestos, Metals & Bacti.pdf

Please find attached outstanding analytical results for effluent samples collected from the BIA Keams Canyon WWTP for the month of February, 2015. The effluent sample was collected during the last day of reported discharge from the facility.

If you have any questions, please contact me.

Thanks.

On Mon, Mar 2, 2015 at 12:19 PM, Graves, John <[john.graves@bia.gov](mailto:john.graves@bia.gov)> wrote:

I have not had a chance to review and/or consolidate the (attached) information, it was just received from Mohave Labs moments ago.

Thanks, and have a terrific week.

--

John F. Graves  
Project Manager / Adviser  
B.S. Environmental Science & Therapy


*"working today for a better tomorrow"*

---

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Project Manager / Adviser  
B.S. Environmental Science & Therapy

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## Howell, Adam

---

**From:** Graves, John <john.graves@bia.gov>  
**Sent:** Wednesday, March 04, 2015 9:47 AM  
**To:** Howell, Adam; Tran, Linh; Sheth, Gary  
**Subject:** keams wwtp / Fwd: Asbestos Final report  
**Attachments:** 201501459-C MEL.pdf

Please see attached. The asbestos result i emailed yesterday had not been certified.

Thanks,

----- Forwarded message -----

From: Sheila Poff <[sheila@mohavelabs.com](mailto:sheila@mohavelabs.com)>  
Date: Wednesday, March 4, 2015  
Subject: Asbestos Final report  
To: [john.graves@bia.gov](mailto:john.graves@bia.gov)  
Cc: "Talahaftewa, Rebecca" <[rebecca.talahaftewa@bia.gov](mailto:rebecca.talahaftewa@bia.gov)>, Melvin Todacheene  
<[Melvin.Todacheene@bia.gov](mailto:Melvin.Todacheene@bia.gov)>, Lori Shade <[lori@mohavelabs.com](mailto:lori@mohavelabs.com)>

John,

Here is the final signed report for the Asbestos.

Thank you very much for your business. If you have any questions, please do not hesitate to contact me.

Our customers are the greatest, have a blessed day!

Sheila Poff

Project Manager

928-754-8101

Fax: 928-754-8103

Mohave Environmental Lab.

2580 Landon Dr. Ste. A



Bullhead City, AZ 86429

“I’ve learned that people will forget what you said, people will forget what you did, but people will never forget how you made them feel.”

-Maya Angelou-

--

John F. Graves  
Project Manager / Adviser  
B.S. Environmental Science & Therapy

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---

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## Howell, Adam

---

**From:** Graves, John <[john.graves@bia.gov](mailto:john.graves@bia.gov)>  
**Sent:** Wednesday, March 04, 2015 12:55 PM  
**To:** Sheth, Gary  
**Cc:** Tran, Linh;Howell, Adam;John Krause;Erwin Kaisem;Kendrick Mahle  
**Subject:** Re: BIA Keams Wastewater Priority Pollutant & Eff. Parameter Test Results (02/15)

Gary,

That result came from a grab sample of the effluent. Unfortunately, there is no data to compare that result to, however it would be my guess that the value is so high because of the extended contact time of wastewater with the chlorine tablets due to the extremely, virtually nonexistent flow of effluent during the day the sample was collected.

On Wed, Mar 4, 2015 at 11:01 AM, Sheth, Gary <[Sheth.Gary@epa.gov](mailto:Sheth.Gary@epa.gov)> wrote:

Hi John,

The Total residual chlorine number is very high 750 ug/L. Where was the sampling done? End of pipe? In the Lagoon? I understand the need for disinfection in light of the breach which may have caused the facility to disinfect aggressively with chlorine to keep the E.coli levels in check, but was wondering if there was any provision to de-chlorinate prior to discharge?

Gary

**From:** Graves, John [mailto:[john.graves@bia.gov](mailto:john.graves@bia.gov)]  
**Sent:** Tuesday, March 03, 2015 3:24 PM  
**To:** Sheth, Gary; Tran, Linh  
**Cc:** Howell, Adam; John Krause; Erwin Kaisem; Kendrick Mahle  
**Subject:** Re: BIA Keams Wastewater Priority Pollutant & Eff. Parameter Test Results (02/15)

Please find attached outstanding analytical results for effluent samples collected from the BIA Keams Canyon WWTP for the month of February, 2015. The effluent sample was collected during the last day of reported discharge from the facility.

If you have any questions, please contact me.

Thanks.

On Mon, Mar 2, 2015 at 12:19 PM, Graves, John <[john.graves@bia.gov](mailto:john.graves@bia.gov)> wrote:

I have not had a chance to review and/or consolidate the (attached) information, it was just received from Mohave Labs moments ago.

Thanks, and have a terrific week.

--

John F. Graves

Project Manager / Adviser

B.S. Environmental Science & Therapy

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## Howell, Adam

---

**From:** Graves, John <john.graves@bia.gov>  
**Sent:** Wednesday, March 04, 2015 1:20 PM  
**To:** Tran, Linh  
**Cc:** Sheth, Gary;Howell, Adam;John Krause;Erwin Kaisem;Kendrick Mahle  
**Subject:** Re: BIA Keams Wastewater Priority Pollutant & Eff. Parameter Test Results (02/15)

disinfection of the effluent, if there will be any, shall be a heavily weighted consideration in the technical evaluation of proposals and final design of the new system/facility. if feasible, I'm hoping that one or more of the of the contractor's will propose UV sterilization as an alternative to a chemical disinfection dechlorination system.

On Wed, Mar 4, 2015 at 2:06 PM, Tran, Linh <[Tran.Linh@epa.gov](mailto:Tran.Linh@epa.gov)> wrote:

John,

I agree with Gary, the TRC number is really high. The 2009 permit does have a provision for dechlorination. The following observations from the Compliance History section of the 2009 permit fact sheet are:

"The Keams Canyon facility has had a long and continuing history of noncompliance with its NPDES permit. EPA has issued several notices of violations for exceedances of permit limits, failure to submit discharge monitoring reports, and failure to respond to EPA's requests for information. The most recent notice was issued on March 14, 2006 to BIA, documenting violations of discharge limits, including BOD<sub>5</sub>, TSS, and fecal coliform bacteria, from 2004 to 2006. EPA conducted inspections at the Keams Canyon facility in September 2006 and June 2009. Chlorination and dechlorination appear to be inadequate. Although the operators have made some adjustments, chlorination and dechlorination tablets are being added manually several times each week rather than adding the tablets based on flow. In addition, the facility had problems addressing the high pH levels from the influent and algae growth in the lagoons contributing to elevated TSS concentrations. Since the inspections, operators from the facility are considering improvements, such as upgrades to the chlorine contact chamber, the addition of citric acid to control pH, and the application of products to control algae, but improvements have yet to be implemented. EPA continues to provide compliance assistance to address these issues."



United States Environmental Protection Agency

Linh Tran

NPDES Permits Office (WTR-2-3)

US EPA Region 9

75 Hawthorne Street, San Francisco, CA 94105

Phone: (415)-972-3511

Email: [Tran.Linh@epa.gov](mailto:Tran.Linh@epa.gov)



Please consider the environment before printing this e-mail

**From:** Graves, John [mailto:[john.graves@bia.gov](mailto:john.graves@bia.gov)]  
**Sent:** Wednesday, March 04, 2015 12:55 PM  
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**Cc:** Tran, Linh; Howell, Adam; John Krause; Erwin Kaisem; Kendrick Mahle  
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Gary

**From:** Graves, John [mailto:[john.graves@bia.gov](mailto:john.graves@bia.gov)]

**Sent:** Tuesday, March 03, 2015 3:24 PM

**To:** Sheth, Gary; Tran, Linh

**Cc:** Howell, Adam; John Krause; Erwin Kaisem; Kendrick Mahle

**Subject:** Re: BIA Keams Wastewater Priority Pollutant & Eff. Parameter Test Results (02/15)

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I have not had a chance to review and/or consolidate the (attached) information, it was just received from Mohave Labs moments ago.

Thanks, and have a terrific week.

--

John F. Graves

Project Manager / Adviser

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## Howell, Adam

---

**From:** Krause, John <john.krause@bia.gov>  
**Sent:** Friday, March 20, 2015 1:38 PM  
**To:** Johnson, Kathleen;Howell, Adam;Shepherdson, Melanie  
**Cc:** Marilyn Fredericks;GSHonanie@hopi.nsn.us;lpuhuyesva@hopi.nsn.us  
**Subject:** Keams Canyon WWTP Compliance Plan (Plan)  
**Attachments:** Keams Canyon WWTP Compliance Plan (1).pdf; Keams Canyon WWTP Compliance Plan Attachments\_opt.pdf

Attached is the subject plan. The document has been scanned to two separate files as the attachments contain reference information and are 29 pages in length while the cover letter and compliance plan are nine pages in length. Recipients may not want to print out the attachments.

The original letter and Plan will be sent by FedEx today with copies mailed to the recipients on the letter.

--

John F. Krause  
Regional Environmental Scientist  
Division of Environmental and Cultural Resources Management  
2600 N. Central Avenue  
Phoenix, AZ 85004  
602-379-3723

## Howell, Adam

---

**From:** Howell, Adam  
**Sent:** Friday, June 19, 2015 9:43 AM  
**To:** Krause, John  
**Cc:** Shepherdson, Melanie; Adrienne Gaziano; Wendell Honanie; Erwin Kaisem; Gerald Knox; Eagle Bull, Tammy; Kendrick Mahle; lpuhuyesva@hopi.nsn.us  
**Subject:** RE: Keams Canyon WWTP Response and Compliance Update

Sorry John,

I meant the first week of July. Thank you for pointing that out Lionel!

*Adam Howell*

Clean Water Act Section  
US EPA Region IX  
(415) 947-4248  
[howell.adam@epa.gov](mailto:howell.adam@epa.gov)

---

**From:** Howell, Adam  
**Sent:** Friday, June 19, 2015 9:26 AM  
**To:** 'Krause, John'  
**Cc:** Shepherdson, Melanie; Adrienne Gaziano; Wendell Honanie; Erwin Kaisem; Gerald Knox; Eagle Bull, Tammy; Kendrick Mahle; lpuhuyesva@hopi.nsn.us  
**Subject:** RE: Keams Canyon WWTP Response and Compliance Update

Thank you for the update John,

Let's check-in again the first week of May.

*Adam Howell*

Clean Water Act Section  
US EPA Region IX  
(415) 947-4248  
[howell.adam@epa.gov](mailto:howell.adam@epa.gov)

---

**From:** Krause, John [<mailto:john.krause@bia.gov>]  
**Sent:** Thursday, June 18, 2015 5:12 PM  
**To:** Howell, Adam  
**Cc:** Shepherdson, Melanie; Adrienne Gaziano; Wendell Honanie; Erwin Kaisem; Gerald Knox; Eagle Bull, Tammy; Kendrick Mahle; [lpuyhuyesva@hopi.nsn.us](mailto:lpuyhuyesva@hopi.nsn.us)  
**Subject:** Re: Keams Canyon WWTP Response and Compliance Update

Adam:

Accomplishments and update information include:

1. Meeting with Contractor, site visit, and survey work completed on June 3, 2015.
2. Liner samples associated with the Aerator Lagoon, Cell #1, and Cell #2 were taken on June 3, 2015 for analysis.